

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST  
NUMBER 1572.11  
HAZARDOUS WASTE SPECIFIC UNIT REQUIREMENTS  
AND  
SPECIAL WASTE PROCESSES AND TYPES**

**APRIL 2016**

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) TITLE AND NUMBER OF THE INFORMATION COLLECTION**

Hazardous Waste Specific Unit Requirements and Special Waste Processes and Types, EPA ICR Number 1572.11, 2050-0050.

### **1(b) SHORT CHARACTERIZATION OF THE INFORMATION COLLECTION**

Section 3004 of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, requires that the U.S. Environmental Protection Agency develop standards for hazardous waste treatment, storage, and disposal facilities (TSDFs), as may be necessary, to protect human health and the environment. Section 3004, Subsections (1), (3), (4), (5), and (6) specify that these standards include, but not be limited to, the following requirements:

- (1) Maintaining records of all hazardous wastes identified or listed under this title which are treated, stored, or disposed of, ... and the manner in which such wastes were treated, stored, or disposed of;
- (3) Treatment, storage, or disposal of all such waste received by the unit pursuant to such operating methods, techniques, and practices as may be satisfactory to the Administrator;
- (4) The location, design, and construction of such hazardous waste treatment, disposal, or storage facilities;
- (5) Contingency plans for effective action to minimize unanticipated damage from any treatment, storage, or disposal of any such hazardous waste; and
- (6) The maintenance or operation of such facilities and requiring such additional qualifications as to ownership, continuity of operation, training for personnel, and financial responsibility as may be necessary or desirable.

The regulations implementing these requirements are published in the Code of Federal Regulations (CFR) Title 40, Parts 261, 264, 265, and 266, Subpart F.

Section 4(b) of this ICR contains a more detailed description of the information collection requirements, including the data items and respondent activities associated with each requirement.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) NEED AND AUTHORITY FOR THE COLLECTION**

This subsection establishes the need and legal authority for each information collection covered in this ICR. All of the collection requirements covered in this ICR have been published in 40 CFR Parts 261, 264 and 265, Subparts I through DD, and 40 CFR Part 266, Subpart F. With each collection covered in this ICR, EPA is aiding the goal of complying with its statutory mandate under RCRA to develop standards for hazardous waste TSDFs, as may be necessary, to protect human health and the environment.

Section 2(b) lists each information collection along with its regulatory citation, and provides precise information regarding the decisions EPA makes with the information provided by the respondents.

## **2(b) PRACTICAL UTILITY AND USERS OF THE DATA**

The information in this section is used for the following:

- Monitor compliance
- Assure hazardous waste is handled properly
- Assure human health and the environment is protected

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) NONDUPLICATION**

The information collections covered in this ICR are not available from sources other than the respondents. EPA's Office of Solid Waste (and authorized States in lieu of EPA) is the only Office within the Agency collecting this information, and no other Federal agency or department collects this information. In addition, the Office of Solid Waste in partnership with the States has systematically reorganized its information collection structure to eliminate gaps or duplication.

### **3(b) PUBLIC NOTICE REQUIRED PRIOR TO ICR SUBMISSION TO OMB**

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice on January 12, 2016 (81 FR 1420). The public comment period extended through March 14, 2016. EPA received no comments.

### **3(c) CONSULTATIONS**

The activities and factors for estimating the burden hours and cost estimates for this ICR are well established. EPA consulted with members of the regulated community that are respondents for the information collection request. Consultations were conducted with: Kathy Shoemaker, Clean Harbors, (870) 864-3711; Noel Bailey, US Ecology, Inc., (208) 834-2275; and Kevin Sheehan, Chemical Waste Management, (716) 754-8231.

### **3(d) EFFECTS OF LESS FREQUENT COLLECTION**

EPA has carefully considered the burden imposed upon the regulated community by the specific unit and by special waste processes and types regulations. Consequently, EPA is confident that those activities required of all respondents are necessary, and to the extent possible, has minimized the burden imposed. EPA believes strongly that if the minimum requirements specified under the regulations are not met, EPA will be unable to fulfill its Congressional mandate to protect public health and the environment.

### **3(e) GENERAL GUIDELINES**

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act, OMB's implementing regulations, EPA's Information Collection Review Handbook, and other applicable OMB guidance.

**3(f) CONFIDENTIALITY**

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which define EPA's general policy on the public disclosure of information, contain provisions for confidentiality. EPA also ensures that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108. EPA does not anticipate requesting any confidential information.

**3(g) SENSITIVE QUESTIONS**

No questions of a sensitive nature are included in any of the information collection requirements.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**4(a) RESPONDENTS UNIVERSE AND NAICS CODES**

The following is a list of North American Industrial Classification System (NAICS) codes associated with the respondents most likely to be affected by the information collection requirements detailed in this ICR.

211112	Natural Gas Liquid Extraction
221111	Hydroelectric Power Generation
221112	Fossil Fuel Electric Power Generation
221113	Nuclear Electric Power Generation
221119	Other Electric Power Generation
221121	Electric Bulk Power Transmission and Control
221122	Electric Power Distribution
22132	Sewage Treatment Facilities
311942	Spice and Extract Manufacturing
323110	Commercial Litographic Printing
323114	Quick Printing
32411	Petroleum Refineries
32511	Petrochemical Manufacturing
32512	Industrial Gas Manufacturing
325131	Inorganic Dye and Pigment Manufacturing
325188	All Other Basic Inorganic Chemical Manufacturing
325193	Ethyl Alcohol Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325211	Plastics Material and Resin Manufacturing
32551	Paint and Coating Manufacturing
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing
331311	Alumina Refining
33271	Machine Shops
332813	Electroplating, Plating, Polishing, Anodizing, and Coloring
332999	All Other Miscellaneous Fabricated Metal Product Manufacturing
333319	Other Commercial and Service Industry Machinery Manufacturing
333999	All Other Miscellaneous General Purpose Machinery Manufacturing

33422	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing
33431	Audio and Video Equipment Manufacturing
334418	Printed Circuit Assembly (Electronic Assembly) Manufacturing
334419	Other Electronic Component Manufacturing
336211	Motor Vehicle Body Manufacturing
336312	Gasoline Engine and Engine Parts Manufacturing
336322	Other Motor Vehicle Electrical and Electronic Equipment Manufacturing
33633	Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing
33634	Motor Vehicle Brake System Manufacturing
33635	Motor Vehicle Transmission and Power Train Parts Manufacturing
336399	All Other Motor Vehicle Parts Manufacturing
42271	Petroleum Bulk Stations and Terminals
44111	New Car Dealers
44711	Gasoline Stations with Convenience Store
44719	Other Gasoline Stations
454311	Heating Oil Dealers
454312	Liquefied Petroleum Gas (Bottled Gas) Dealers
48411	General Freight Trucking, Local
48421	Used Household and Office Goods Moving
48422	Specialized Freight (except Used Goods) Trucking, Local
562111	Solid Waste Collection
562112	Hazardous Waste Collection
562119	Other Waste Collection
562211	Hazardous Waste Treatment and Disposal
562212	Solid Waste Landfill
562213	Solid Waste Combustors and Incinerators
562219	Other Non-hazardous Waste Treatment and Disposal
56292	Materials Recovery Facilities
811111	General Automotive Repair

**4(b) INFORMATION REQUESTED**

The following subsection presents the data items and respondent activities required for each of the broad information collection areas introduced in the previous section.

**CONTAINERS**

**Interim status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart I is expected to read the regulations.

Inspections

40 CFR 265.174 requires owners and operators of interim status containers to conduct inspections of the areas where the containers are stored. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with these requirements includes:

- Documentation pertaining to the weekly inspection of the areas where the containers are stored. During each inspection, owners and operators must look for leaks and for deterioration caused by corrosion or other factors.

(ii) Respondent activity:

Respondents must perform the following activity in documenting in the operating record of the facility the inspection of the area where the containers are stored:

- Record all inspection data.

Air emission standards

40 CFR 265.178 requires owners and operators of interim status facilities to manage all hazardous waste placed in a container in accordance with the applicable requirements of Subparts AA, BB, and CC. All data items and respondent activities under Subparts AA and BB, as applicable to containers, are covered later in this ICR under process vents and equipment leaks, respectively. Data items and respondent activities under Subpart CC, as applicable to containers, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission Standards for Tanks, Surface Improvements and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart I is expected to read the regulations.

Inspections

40 CFR 264.174 requires owners and operators of permitted containers to conduct inspections of the areas where the containers are stored. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with these requirements includes:



- Documentation pertaining to the weekly inspection of the areas where the containers are stored. During each inspection, owners and operators must look for leaks and for deterioration caused by corrosion or other factors.

(ii) Respondent activity: Respondents must perform the following activity in documenting to the operating record of the facility the inspection of the area where the containers are stored:

- Record all inspection data.

#### Air emission standards

40 CFR 264.179 requires owners and operators of interim status facilities to manage all hazardous waste placed in a container in accordance with the applicable requirements of subparts AA, BB, and CC. All data items and respondent activities under Subparts AA and BB, as applicable to containers, are covered later in this ICR under process vents and equipment leaks, respectively. Data items and respondent activities under Subpart CC, as applicable to containers, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission Standards for Tanks, Surface Improvements and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

## **TANK SYSTEMS**

### **Interim status facilities:**

#### Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart J is expected to read the regulations.

#### No-free-liquids demonstration

40 CFR 265.190(a) releases tank system owner/operators from the requirements of §265.193 (containment and detection of releases) provided that the tanks are located in buildings with impermeable floors and are used to store or treat wastes that contain no free liquids. Owner/operators must demonstrate the absence of free liquids by using EPA Method 9095 (Paint Filter Liquids Test) as described in “Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods” (EPA Publication No. SW-846) in order to be exempt from these requirements.

(i) Data item:

The data item required to comply with this requirement includes:

- Results of the Paint Filter Liquids Test, performed as specified in SW-846.

(ii) Respondent activities:

Respondents must perform the following activities in performing this demonstration:

- Perform Paint Filter Liquids Test as required; and
- File test results at the facility.

#### Assessment of existing tank systems' integrity

Under 40 CFR 265.191 owner/operators of facilities with tank systems that (1) store or treat waste that becomes hazardous after July 14, 1986 and (2) do not meet the secondary containment requirements of 40 CFR 265.193 must determine that the tank systems are sufficient for storing or treating hazardous waste.

##### (i) Data item:

The data item required to comply with this requirement includes:

- For each tank system, a written assessment that has been reviewed and certified by an independent, qualified registered professional engineer in accordance with 40 CFR 270.11(d). At a minimum, the assessment must consider the following:
  - The design standards to which the tank and ancillary equipment were constructed;
  - Hazardous characteristics of the waste(s) that has been and will be handled;
  - Existing corrosion protection measures;
  - The tank's documented or estimated age; and
  - Results of a leak test performed as specified in 40 CFR 265.191(b)(5)(i) and (ii).

##### (ii) Respondent activities:

Respondents must perform the following activities in assessing their tank systems:

- Perform the leak test as specified in 40 CFR 265.191(b)(5)(i) and (ii);
- Write or have written an assessment certified by an independent, qualified, registered professional engineer that attests to the tank system's integrity; and
- File the assessment at the facility.

#### Design and installation of new tank systems or components

40 CFR 265.192 requires owner/operators of new tank systems or components to obtain a written assessment attesting that the tank system is acceptable for storing and treating hazardous waste. In addition, owner/operators must obtain and keep on file at the unit statements written by those who designed the tank system and supervised its construction. These statements will verify that the system was designed and constructed properly.

(i) Data items:

Data items required to comply with these requirements include:

- For each new tank system, a written assessment that has been reviewed and certified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d). At a minimum, the assessment must report on the following:
  - The design standards to which the tank and ancillary equipment were constructed;
  - Hazardous characteristics of the waste(s) to be handled;
  - For new systems or components in which any external metal component of the tank system will be in contact with soil or water, a determination by a corrosion expert of the factors affecting the potential for and protection from corrosion as specified in 40 CFR 265.192(a)(3)(i) and (ii);
  - For underground tank systems likely to be adversely affected by vehicular traffic, the design or operational measures that will protect the tank system from damage; and
  - Design considerations to ensure that: (1) tank foundations will maintain the load of a full tank, (2) the systems will not float or dislodge when placed in a saturated or seismic fault zone, and (3) the systems will withstand the effects of frost heave.
- Maintain records of statements written by those who certify the tank system's design and supervise its installation (§265.192(g)). These records must verify that the system was designed and installed according to the regulatory requirements, and that any needed repairs were performed. They must also include the certification statement as required in 40 CFR 270.11(d).

(ii) Respondent activities:

Respondents must perform the following activities in complying with these requirements:

- Prepare the written assessment and have it reviewed and certified;
- Obtain written statements from those who certified the design of the tank system and supervised its installation; and
- Maintain the written statements at the facility.

Containment and detection requirements

40 CFR 265.193 requires tank systems to have secondary containment that will prevent the release of hazardous constituents into the environment. New tank systems must have the containment installed prior to their being put into service. The dates by which containment must be installed on existing tank systems depend upon the waste types handled, the system's age, and other factors. The information collection requirements in this section include reports to the Regional Administrator that will exempt, when appropriate, tank system owner/operators from specific secondary containment standards. In addition, 40 CFR 265.193(g) allows owner/operators to obtain a variance from all secondary containment requirements if they can demonstrate to the Regional Administrator that alternative design and operating practices, together with location characteristics, will be as protective of the environment as secondary containment.

#### Equivalent containment devices

40 CFR 265.193(d) requires all secondary containment for tank systems to include one or more of the following devices: a liner; a vault; a double-walled tank; or an equivalent device, as approved by the Regional Administrator. The regulations do not specify the means by which respondents will obtain approval of their equivalent containment devices. Though some respondents may choose to use a previously-approved containment device, this ICR assumes that owner/operators will submit to the Regional Administrator written information regarding the design and type of device, as well as additional information that may be necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank.

(i) Data item:

The data item required to comply with this requirement includes:

- Written information regarding the design and type of containment device as well as additional information that may be necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank.

(ii) Respondent activities:

Respondents must perform the following activities in obtaining approval for their equivalent containment device:

- Gather information regarding the design and type of containment device as well as additional information necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank; and
- Submit the information to the Regional Administrator.

#### Exemption from 24-hour leak detection requirement

40 CFR 265.193(e)(3)(iii) requires secondary containment systems to have a leak detection system that will detect a release within 24 hours. If owner/operators can demonstrate that existing technologies or site conditions will not allow detection within 24 hours, they may use a leak detection system that will detect failure or contamination "at the earliest practicable time."

(i) Data item:

The data item required to comply with this requirement includes:

- Any such evidence regarding existing technologies or site conditions sufficient to show that the leak detection system cannot detect failure or contamination within 24 hours.

(ii) Respondent activities:

Respondents must perform the following activities in obtaining an exemption from the 24 hour detection requirement:

- Compile evidence showing that the leak detection system cannot detect failure or contamination within 24 hours; and
- Submit the evidence to the Regional Administrator.

Variance from secondary containment requirements

40 CFR 265.193(g) allows owner/operators to obtain a variance from all secondary containment requirements if they can demonstrate to the Regional Administrator that (1) alternative design and operating practices, together with location characteristics, will prevent the migration of hazardous constituents into the ground water or surface water as effectively as secondary containment or (2) if a release does migrate to ground or surface water, that the release will pose no substantial hazard.

(i) Data item:

The data item required to comply with this requirement includes:

- A written notification to the Regional Administrator indicating intent to conduct and submit a demonstration for a variance from secondary containment. This notification must contain:
  - A description of the steps necessary to conduct the demonstration (which must address each factor listed in 40 CFR 265.193(g)(1) and (2)); and
  - A timetable for completing each step.

(ii) Respondent activities:

Respondents must perform the following activities in obtaining a variance from secondary containment:

- Prepare and submit, to the Regional Administrator, the notification of intent to conduct a demonstration (for existing tank systems, notification must be submitted 24 months prior to the date at which secondary containment must be provided; for new systems, notification must be submitted at least 30 days before entering into a contract to install the system);

- Complete the demonstration in accordance with 40 CFR 265.193(g)(1) and (2); and
- Submit the completed demonstration to the Regional Administrator within 180 days of submitting the notification.

Annual leak tests and inspections

40 CFR 265.193(i) requires owner/operators, until they meet the secondary containment requirements, to conduct annual leak tests and/or inspections of their tanks and ancillary equipment. Records of these assessments must be kept on file at the facility. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required for these recordkeeping requirements is:

- A record of the results of the leak tests and/or inspections required under 40 CFR 265.193(i).

(ii) Respondent activities:

Respondents must perform the following activities in filing a record of the assessment results:

- For non-enterable underground tanks, conduct a leak test that meets the requirements of 40 CFR 265.191(b)(5);
- For all other tanks and for ancillary equipment, conduct an annual leak test that meets the requirements in 40 CFR 265.191(b)(5) or have the tanks and equipment inspected as described in 40 CFR 265.193(i)(2); and
- Record the inspection and/or test results.

Inspections

40 CFR 265.195 requires owners and operators of interim status tank systems to conduct inspections of their units. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required to comply with these requirements include:

- Documentation pertaining to the daily inspection, where present, of the following components of the tank system:

- Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order;
  - The aboveground portions of the tank system, if any, to detect corrosion or release of waste;
  - Data gathered from monitoring equipment and leak-detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and
  - The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).
- Documentation pertaining to the inspection of cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:
    - The proper operation of the cathodic protection system must be confirmed within six months after initial installation, and annually thereafter; and
    - All sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).

(ii) Respondent activity:

Respondents must perform the following activity in documenting in the operating record of the facility the inspection of the tank systems:

- Record all inspection data.

Responses to leaks or spills; disposition of leaking or unfit-for-use tank systems

Exemption from the 24-hour waste removal requirement

40 CFR 265.196 requires a tank system or secondary containment system from which there has been a spill to be removed from service immediately. Paragraph (b) of that section requires owner/operators, within 24 hours, to remove enough waste from the system to prevent further release and allow for inspection and repair of the tank. If the owner/operator can demonstrate that it is not possible to do so within 24 hours, the waste may be removed at the earliest practicable time.

(i) Data item:

The data item required for this demonstration includes:

- Any such evidence sufficient to show that, within 24 hours, the owner/operator cannot remove enough waste from the system to prevent further release and allow for system inspection and repair.

(ii) Respondent activities:

Respondents must perform the following activities in making this demonstration:

- Compile evidence showing that, within 24 hours, enough waste cannot be removed from the system to prevent further release and allow for system inspection and repair; and
- Submit the evidence to the Regional Administrator.

Release notifications and reports; major repair certifications

40 CFR 265.196(d) requires facilities to comply with certain reporting requirements in the case of a leak or spill. Owner/operators must notify the Regional Administrator of any release to the environment (except as defined in 40 CFR 265.196(d)(2)) within 24 hours of detection,<sup>1</sup> and submit a detailed report within 30 days. In addition, where the leak or spill is caused by major system damage, 40 CFR 265.196(f) requires that owner/operators submit to the Regional Administrator a certification of major repairs. This documents that the system has been repaired and is capable of handling hazardous waste without release, and must be submitted to the Regional Administrator within 7 days of returning the system to use.

(i) Data items:

Data items required for release notifications and reports include:

- A notification to the Regional Administrator that there has been a release;
- A report to the Regional Administrator containing the following information:
  - The release's likely migration route;
  - The surrounding soil characteristics;
  - The results of any monitoring or sampling conducted in connection with the release (if not available within 30 days, results must be submitted as soon as practicable);
  - The release's proximity to down gradient drinking water, surface water, and population areas; and
  - A description of the response actions taken or planned.

Data items required for a certification of major repairs include:

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<sup>1</sup> If the release has been reported pursuant to 40 CFR Part 302 (CERCLA §103), that report will satisfy this requirement.



- A certification by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system.

(ii) Respondent activities:

Respondents must perform the following activities in preparing and submitting release notifications and reports:

- Within 24 hours of detection, notify the Regional Administrator that there has been a release; and
- Within 30 days of detection, prepare a detailed report for submission to the Regional Administrator. In order to do so, owner/operators must:
  - Determine the release's likely migration route;
  - Provide information on the surrounding soil characteristics;
  - Conduct appropriate monitoring or sampling;
  - Determine the release's proximity to down gradient drinking water, surface water, and population areas;
  - Describe the response actions taken or planned; and
  - Compile and submit the report to the Regional Administrator.

Respondents must perform the following activities in preparing and submitting a certification of major repairs:

- Obtain a certification in accordance with 40 CFR 270.11(d); and
- Within 7 days of returning the system to use, submit the certification to the Regional Administrator.

Closure and post-closure care

Decontamination demonstration

40 CFR 265.197 regulates tank system closure and post-closure care. Paragraph (a) stipulates that the closure plan, closure activities, cost estimates for closure, and financial responsibility for tank systems must meet all of the requirements of 40 CFR Subparts G and H. Tank systems will be required to submit a decontamination of soils demonstration under §264.197(b) and §265.197(b). All other information collection requirements for tank system closure and post-closure care are contained in EPA ICR Number 1571, "General Hazardous Waste Facility Standards."

(i) Data items:

No specific data items are to be included in this demonstration.

(ii) Respondent activities:

Respondents must perform the following activities in performing this demonstration:

- Prepare decontamination demonstration; and
- Submit demonstration to EPA.

Waste analysis and trial tests

40 CFR 265.200 requires interim status tank system owner/operators to gather waste analysis data (in addition to that required in §265.13) when a tank system is used to treat chemically or store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or treat chemically a hazardous waste with a substantially different process than any previously used in that tank system. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with this requirement includes:

- Documentation pertaining to waste analyses and trial treatment or storage tests (e.g., bench-scale or pilot-plant scale tests);

OR

- Documentation on similar waste under similar operating conditions to show that the proposed treatment or storage will meet the requirements of §265.194(a).

(ii) Respondent activities:

Respondents must perform the following activities in performing this demonstration:

- Conduct the waste analyses and trial tests; and
- Obtain written, documented information to show that the proposed treatment or storage will meet the requirements of §265.194(a).

Air emission standards

40 CFR 265.202 requires owners and operators of interim status facilities to manage all hazardous waste placed in a tank in accordance with the applicable requirements of 40 CFR part 265, Subparts AA, BB, and CC. All data items and respondent activities under Subparts AA and BB, as

applicable to tanks, are covered later in this ICR under process vents and equipment leaks, respectively. Data items and respondent activities under Subpart CC, as applicable to tanks, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

### **Permitted facilities:**

#### Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart J is expected to read the regulations.

#### No-free-liquids demonstration

40 CFR 264.190(a) releases tank system owner/operators from the requirements of §§ 264.193 (containment and detection of releases) provided that the tanks are located in buildings with impermeable floors and are used to store or treat wastes that contain no free liquids. Owner/operators must demonstrate the absence of free liquids by using EPA Method 9095 (Paint Filter Liquids Test) as described in “Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods” (EPA Publication No. SW-846) in order to be exempt from these requirements.

#### (i) Data item:

The data item for demonstrating the absence of free liquids includes:

- Results of the Paint Filter Liquids Test, performed as specified in SW-846.

#### (ii) Respondent activities:

Respondents must perform the following activities in performing this demonstration:

- Perform the Paint Filter Liquids Test as required; and
- File test results at the facility.

#### Assessment of existing tank systems’ integrity

Under 40 CFR 264.191 owner/operators of facilities with tank systems that (1) store or treat waste that becomes hazardous after July 14, 1986 and (2) do not meet the secondary containment requirements of 40 CFR 264.193 must determine that the tank systems are sufficient for storing or treating hazardous waste.

#### (i) Data items:

Data items for this determination include:

- For each tank system, a written assessment that has been reviewed and certified by an independent, qualified registered professional engineer in accordance with 40 CFR 270.11(d). At a minimum, the assessment must consider the following:

- The design standards to which the tank and ancillary equipment were constructed;
- Hazardous characteristics of the waste(s) that has been and will be handled;
- Existing corrosion protection measures;
- The tank's documented or estimated age; and
- Results of a leak test performed as specified in 40 CFR 264.191(b)(5)(i) and (ii).

(ii) Respondent activities:

Respondents must perform the following activities in assessing their tank systems:

- Perform the leak test as specified in 40 CFR 264.191(b)(5)(i) and (ii);
- Write or have written an assessment certified by an independent, qualified, registered professional engineer that attests to the tank system's integrity; and
- File the assessment at the unit.

Design and installation of new tank systems or components

40 CFR 264.192 requires owner/operators of new tank systems or components to obtain a written assessment attesting that the tank system is acceptable for storing and treating hazardous waste. Since permitted facilities submit this assessment with their part B permit application, activities associated with obtaining and submitting a written assessment are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (EPA ICR Number 1573).

40 CFR 264.192(g) requires owner/operators to obtain and keep on file at the unit statements written by those who designed the tank system and supervised its construction. These statements will verify that the system was designed and constructed properly.

(i) Data item:

The data item for this requirement includes:

- Maintaining records of statements written by those who certify the tank system's design and supervise its installation. These must verify that the system was designed and installed according to the regulatory requirements, and that any needed repairs were performed. They must also include the certification statement as required in 40 CFR 270.11(d).

(ii) Respondent activities:

Respondents must perform the following activities in complying with these requirements:

- Obtain written statements from those who certified the design of the tank system and supervised its installation; and
- Maintain the written statements at the unit.

Containment and detection requirements

Equivalent containment device

40 CFR 264.193(d) requires all secondary containment for tank systems to include one or more of the following devices: a liner; a vault; a double-walled tank; or an equivalent device, as approved by the Regional Administrator. The regulations do not specify the means by which respondents will obtain approval of their equivalent containment devices. Though some respondents may choose to use a previously-approved containment device, this ICR assumes that owner/operators will submit to the Regional Administrator written information regarding the design and type of device, as well as additional information that may be necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank. Since permitted facilities submit an applications for obtaining equivalent containment device approval with their part B permit application, data items and activities associated with preparing and submitting this information are covered in the Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

Exemption from 24-hour leak detection requirements

40 CFR 264.193(e)(3)(iii) requires secondary containment systems to have a leak detection system that will detect a release within 24 hours. If owner/operators can demonstrate that existing technologies or site conditions will not allow detection within 24 hours, they may use a leak detection system that will detect failure or contamination “at the earliest practicable time.” Since permitted facilities submit applications for exemption from 24-hour leak detection requirements with their part B permit application, data items and activities associated with preparing and submitting this information are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

Variance from secondary containment requirements

40 CFR 264.193(g) allows owner/operators to obtain a variance from all secondary containment requirements if they can demonstrate to the Regional Administrator that (1) alternative design and operating practices, together with location characteristics, will prevent the migration of hazardous constituents into the ground water or surface water as effectively as secondary containment or (2) if a release does migrate to ground or surface water, that the release will pose no substantial hazard. Since permitted facilities submit an applications for variances from secondary containment requirements with their part B permit application, data items and activities associated with preparing and submitting this information are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

Annual leak tests and inspections

40 CFR 264.193(i) requires owner/operators, until they meet the secondary containment requirements, to conduct annual leak tests on the tank system and ancillary equipment and/or develop a schedule and procedures for assessing their tanks. Records of the tests and assessments must be kept on file at the facility. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required for these recordkeeping requirements is:

- A record of the results of the leak tests and/or inspections required under 40 CFR 264.193(i).

(ii) Respondent activities:

Respondents must perform the following activities in filing a record of the assessment results:

- For non-enterable underground tanks, conduct a leak test that meets the requirements of 40 CFR 264.191(b)(5), or other method approved or required by the Regional Administrator;
- For all other tanks and ancillary equipment, conduct the annual leak test (above) or develop a schedule and procedure, in accordance with 40 CFR 264.193(i)(2), for assessing the overall condition of the tank system. This assessment must be performed by an independent, qualified, registered professional engineer; and
- Record all inspection and/or test results.

Inspections

40 CFR 264.195 requires owners and operators of interim tank systems to conduct inspections of their units. Data collected during these inspections must be documented in the operating record of the facility. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required to comply with these requirements include:

- Documentation pertaining to the inspection of overfill controls (i.e., schedule, procedures, and data collected during inspections).
- Documentation pertaining to the daily inspection of the following components of the tank system:

- The aboveground portions of the tank system, if any, to detect corrosion or release of waste;
- Data gathered from monitoring equipment and leak-detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and
- The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).
- Documentation pertaining to the inspection of cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:
  - The proper operation of the cathodic protection system must be confirmed within six months after initial installation, and annually thereafter; and
  - All sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).

(ii) Respondent activity:

Respondents must perform the following activity in documenting in the operating record of the facility the inspection of the tank systems:

- Record all inspection data.

Responses to leaks or spills; disposition of leaking or unfit-for-use tank systems

Exemption from the 24-hour waste removal requirement

40 CFR 264.196 requires a tank system or secondary containment system from which there has been a spill to be removed from service immediately. Paragraph (b) of that section requires owner/operators, within 24 hours, to remove enough waste from the system to prevent further release and allow for inspection and repair of the tank. If the owner/operator can demonstrate that it is not possible to do so within 24 hours, the waste may be removed at the earliest practicable time.

(i) Data item:

The data item required for this demonstration includes:

- Any such evidence sufficient to show that, within 24 hours, the owner/operator cannot remove enough waste from the system to prevent further release and allow for system inspection and repair.

(ii) Respondent activities:

Respondents must perform the following activities in making this demonstration:

- Compile evidence showing that, within 24 hours, enough waste cannot be removed from the system to prevent further release and allow for system inspection and repair; and
- Submit the evidence to the Regional Administrator.

Release notifications and reports; major repair certifications

40 CFR 264.196(d) requires facilities to comply with certain reporting requirements in the case of a leak or spill. Owner/operators must notify the Regional Administrator of any release to the environment (except as defined in 40 CFR 264.196(d)(2)) within 24 hours of detection,<sup>2</sup> and submit a detailed report within 30 days. In addition, where the leak or spill is caused by major system damage, 40 CFR 264.196(f) requires that owner/operators submit to the Regional Administrator a certification of major repairs. This documents that the system has been repaired and is capable of handling hazardous waste without release, and must be submitted to the Regional Administrator within 7 days of returning the system to use.

(i) Data items:

Data items required for release notifications and reports include:

- A notification to the Regional Administrator that there has been a release;
- A report to the Regional Administrator containing the following information:
  - The release's likely migration route;
  - The surrounding soil characteristics;
  - The results of any monitoring or sampling conducted in connection with the release (if not available within 30 days, results must be submitted as soon as practicable);
  - The release's proximity to down gradient drinking water, surface water, and population areas; and
  - A description of the response actions taken or planned.

Data items required for a certification of major repairs include:

- A certification by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system.

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<sup>2</sup> If the release has been reported pursuant to 40 CFR Part 302 (CERCLA §103), that report will satisfy this requirement.



(ii) Respondent activities:

Respondents must perform the following activities in preparing and submitting release notifications and reports:

- Within 24 hours of detection, notify the Regional Administrator that there has been a release;
- Within 30 days of detection, prepare a detailed report for submission to the Regional Administrator. In order to do so, owner/operators must:
  - Determine the release's likely migration route;
  - Provide information on the surrounding soil characteristics;
  - Conduct appropriate monitoring or sampling;
  - Determine the release's proximity to down gradient drinking water, surface water, and population areas;
  - Describe the response actions taken or planned; and
  - Compile and submit the report to the Regional Administrator.

Respondents must perform the following activities in preparing and submitting a certification of major repairs:

- Obtain a certification in accordance with 40 CFR 270.11(d); and
- Within 7 days of returning the system to use, submit the certification to the Regional Administrator.

Closure and post-closure care

Decontamination demonstration

40 CFR 264.197 regulates tank system closure and post-closure care. Paragraph (a) stipulates that the closure plan, closure activities, cost estimates for closure, and financial responsibility for tank systems must meet all of the requirements of 40 CFR Part 264, Subparts G and H. Tank systems will be required to submit a decontamination of soils demonstration under §264.197(b) and §265.197(b). All other information collection requirements for tank system closure and post-closure care are contained in ICR Number 1571, "General Hazardous Waste Facility Standards."

(i) Data items:

No specific data items are to be included in this demonstration.

(ii) Respondent activities:

Respondents must perform the following activities in performing this demonstration:

- Prepare decontamination demonstration; and
- Submit demonstration to EPA.

#### Air emission standards

40 CFR 264.200 requires owners and operators of permitted facilities to manage all hazardous waste placed in a tank in accordance with the applicable requirements of 40 CFR part 264, Subparts AA, BB, and CC. All data items and respondent activities under Subparts AA and BB, as applicable to tanks, are covered later in this ICR under process vents and equipment leaks, respectively. Data items and respondent activities under Subpart CC, as applicable to tanks, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

## **SURFACE IMPOUNDMENTS**

### **Interim status facilities:**

#### Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart K is expected to read the regulations.

#### Design and operating requirements

Under 40 CFR 265.221, interim status facilities will need to submit information to EPA or the authorized State if they seek an exemption from the liner and/or leachate system requirements specified in §265.221(a), (c), or (e).

40 CFR 265.221 requires interim status facilities to notify EPA at least 60 days before receiving waste. Respondents are also required to file Part B of their permit application within six months of EPA’s receipt of the notification. The Part B information collection activities are described in the “Part B Permit Application, Permit Modification, and Special Permits ICR (EPA ICR Number 1573).

Under the general operating requirements detailed in §265.222, facilities must assess their design features and operating plans with regard to dike overtopping prevention requirements. Records of these assessments must be maintained at the unit.

#### (i) Data items:

In seeking an exemption from the liner and/or leachate system requirements specified in §265.221(a), (c), or (e), respondents will need to report and maintain records on the following data item:

- A written assessment of alternate design and operating practices, together with location characteristics, that will prevent the migration of any hazardous constituents into the ground water or surface water as effectively as the requirements.

The data item required to comply with the notification requirement is:

- A notification to EPA or the authorized State at least 60 days prior to receiving waste.

The data items for the recordkeeping requirement under §265.222 include:

- A written identification of the alternate design features or operating plans that will prevent overtopping of a dike; and
- A certification from a qualified engineer that these alternate design features or operating plans will prevent overtopping.

(ii) Respondent activities:

In order to complete the assessment, facilities will need to perform the following activities:

- Prepare and submit the written assessment of alternative design and operating practices to EPA or the authorized State; and
- File and maintain the written assessment and related data at the unit.

Respondents will need to engage in the following activities in order to notify EPA before receiving waste:

- Prepare the notification and submit it to the Regional Administrator.

Respondents will perform the following activities in assessing their dike overtopping design features and operating plans:

- Prepare the written identification of the alternate design features or operating plans that will prevent overtopping of a dike;
- Obtain the certification from a qualified engineer that these alternate design features or operating plans will prevent overtopping; and
- Maintain the certification and written identification at the unit.

Developing and submitting action leakage rates

Pursuant to section 265.222(a), the owner or operator of each new and replacement surface impoundment and each lateral expansion of a surface impoundment subject to §265.221(a) must propose an action leakage rate, with rationale, to EPA when submitting the notice required under §265.221(b) for interim status facilities. After 60 days from the notification date, the action leakage rate will be established as proposed by the interim status owner or operator, unless otherwise acted upon by EPA. In

addition, §265.73 requires owners or operators to maintain records of all monitoring, testing, or analytical data, and corrective action in connection with the action leakage rate, as required under §265.222.

(i) Data item:

The data item required to comply with this requirement includes:

- A proposed action leakage rate that is the maximum design flow rate that the leak detection system can remove without the fluid head on the bottom liner exceeding one (1) foot, allowing for an adequate safety margin to allow for uncertainties in the design, construction, operation, and location of the leak detection system; waste and leachate characteristics; likelihood and amounts of other sources of liquids in the leak detection system; and proposed response actions.

(ii) Respondent activities:

Respondents must perform the following activities for developing action leakage rates:

- Develop and submit to EPA a proposed action leakage rate and rationale, as specified in section 265.222; and
- Maintain results of analyses, as required by §265.73.

Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, the owner or operator of the surface impoundment must use the weekly or monthly flow rates from the monitoring data obtained under §265.226(b) and calculate average daily flow rates (in gallons per acre per day), in accordance with §265.222(c). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period, and monthly during the post-closure care period, if the unit is closed in accordance with section 265.228(b), and when required under section 265.226(b).

(i) Data item:

The data item required to comply with these requirements includes:

- Calculation of the average daily flow rates weekly during the active life and closure period, and monthly during the post-closure care period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate average daily flow rates as required by §265.222(c).

Completion and submittal of the Response Action Plan and recordkeeping of response actions

Section 265.223(a) require the owner or operator of each new surface impoundment unit, each replacement of an existing surface impoundment unit, and each lateral expansion of a surface impoundment unit subject to section 265.221(a) to prepare a Response Action Plan (RAP). The plan must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under §265.223(b). Interim status facilities must submit the RAP to EPA when submitting the action leakage rate under §265.223(a).

(i) Data item:

The data item required to comply with these requirements includes:

- Response Action Plan.

(ii) Respondent activities:

- Develop Response Action Plan;
- Submit Response Action Plan to the Regional Administrator; and
- Maintain a copy of the Response Action Plan and records of analyses.

Action leakage reporting

In the event the flow rate into the leak detection system exceeds the action leakage rate, section 265.223(b) requires the owner or operator to undertake the following activities.

(i) Data items:

The following data items are required if the action leakage rate is exceeded:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as to the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned;
- Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and

- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as specified in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §265.223(b)(1);
- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required §265.223(b)(2);
- Determine, to the extent practicable, the location, size and cause of any leak, as required by §265.223(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §265.223(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs(b)(3), (4), and (5), the results of the actions taken, and actions planned, and monthly thereafter as required by §265.223(b)(6).

Remediation determination analyses

Under 40 CFR 265.223(b)(3), (4), and (5), owners and operators must make leak and/or remediation determinations.

(i) Data items:

The data items required to comply with these requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and

- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities when conducting a remediation determination analyses:

- Perform the following activities to make leak and/or remediation determinations:
  - Assess the source of liquids and amounts of liquids, as required by section §265.223(c)(1)(i);
  - Conduct a fingerprint, hazardous constituent, or other analyses, as required by section §265.223(c)(1)(ii); and
  - Assess the seriousness of any leaks, as required by section 265.223(c)(1)(ii).

OR

- Document why assessments above are not needed, as required by §265.223(c)(1)(iii).

Waste analysis and trial tests

40 CFR 265.225 requires interim status surface impoundment owner/operators to gather waste analysis data (in addition to that required in §264.13) when a surface impoundment is used to chemically treat hazardous waste with a substantially different method than any previously used in the same impoundment. If this is the case, the owner or operator must gather and maintain records on the data items listed below.

Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

- Documentation pertaining to waste analyses and trial treatment tests (e.g., bench-scale or pilot-plant scale tests); and
- Documentation on similar treatment of similar waste under similar operating conditions to show that the treatment will comply with §265.17(b).

(ii) Respondent activities:

Respondents must perform the following activities in gathering these data:

- Conduct waste analyses and trial tests; and
- Obtain written, documented information to show that the treatment will comply with §265.17(b).

Monitoring and inspection

Section 265.226(a) and (b) require owners and operators of facilities that have interim status surface impoundments to inspect their units and to record the specified inspection activities. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

i Data items:

Data items required to comply with these requirements include:

- ii Records pertaining to the inspection of the freeboard level at least once each operating day, as required by §265.222 (§265.226(a));
- iii Records pertaining to the inspection of the surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration, or failures in the impoundment (§265.226(a)); and
- iv Records pertaining to the level of any liquids in the leak detection system removal sumps and the amount of liquids removed from the LDS sumps each week during the active life and closure period, as specified in §265.226(b)(1); and, if applicable, at least monthly during the post-closure care period, at least quarterly if the liquid level in the sump stays below the pump operating level for two consecutive months, or at least semi-annually if the liquid level in the sump stays below the pump operating level for two consecutive quarters, as specified in §265.226(b)(2) (§265.226(b)).

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

- Record all inspection data.

Developing and submitting pump operating levels

Section 265.226(b)(3) require owners or operators of each new surface impoundment unit, each replacement of an existing surface impoundment unit, and each lateral expansion of a surface impoundment unit required to have leak detection systems (LDS) under section 265.221(a) to submit pump operating level proposals, with rationale, to EPA when submitting the action leakage rate proposal required under §265.222(a). In addition, section 265.73 require owners and operators to maintain records



of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under section 265.226.

(i) Data items:

Data items required to comply with these requirements include:

- A proposed pump operating level that is a liquid level based on the pump activation level, sump dimensions, and level that avoids backup into the drainage layer and that minimizes the head in the sump; and
- Recordkeeping, as required by §265.73, of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under section 265.226.

(ii) Respondent activities:

Respondents must perform the following activities when developing pump operating levels:

- Develop and submit to the Regional Administrator a pump operating level and rationale, as specified in section 265.226(b)(3); and
- Maintain records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities, in accordance with section 265.73.

Requirements for ignitable or reactive waste

Under 40 CFR 265.229, interim status facilities may not place ignitable or reactive waste in a surface impoundment unless the waste meets the specifications of §265.229(a) or the impoundment is used solely for emergencies, or: (1) the waste is protected from any conditions that may cause it to ignite or react, and (2) the owner/operator obtains a certification from a chemist or engineer that the design features or unit operating plans will prevent ignition or reaction, and (3) the certification and the basis for it are maintained at the unit.

(i) Data items:

The data items required to comply with the certification requirement are:

- A certification from a qualified chemist or engineer that the design features or unit operating plans will prevent ignition or reaction; and
- The basis by which the chemist or engineer made the certification.

(ii) Respondent activities:

Respondents must perform the following activities to comply with this data collection:

- Obtain the certification as required in 40 CFR 265.229; and
- File and maintain this certification and related data at the unit.

### Closure

Under 40 CFR 265.113(e) an owner or operator of a hazardous waste surface impoundment that is not in compliance with the liner and leachate collection system requirements in 42 U.S.C. 3004(o)(1) and 3005(j)(1) or 2 U.S.C. 3004(o)(2) or (3) or 3005(j)(2), (3),(4), or (13) must implement closure and corrective action measures.

#### (i) Data items:

The data items required to comply with these requirements are:

- A contingent corrective measures plan, unless a corrective action plan has already been submitted under;
- A plan for removing hazardous wastes in compliance with paragraph (e)(2) of this section;
- An extension request, based on a demonstration that the removal of hazardous wastes will, of necessity, take longer than the allotted period to complete and that an extension will not pose a threat to human health and the environment; and
- A semi-annual report to the Regional Administrator that describes the progress of the corrective action program.

#### (ii) Respondent activities:

- Prepare and submit a contingent corrective measures plan in accordance with §265.113(e)(1)(i);
- Prepare and submit a hazardous waste removal plan in accordance with §265.113(e)(1)(ii);
- Prepare and submit an extension request, as specified in §265.113(e)(3); and
- Prepare and submit a corrective action report twice per year, as required by §265.113(e)(5).

### Air emission standards

40 CFR 265.231 requires owners and operators of interim status facilities to manage all hazardous waste placed in a surface impoundment in accordance with the applicable requirements of 40 CFR Part 265, Subparts BB and CC. All data items and respondent activities under Subpart BB, as applicable to surface impoundments, are covered later in this ICR under equipment leaks. Data items and respondent activities under Subpart CC, as applicable to surface impoundments, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission

Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart K is expected to read the regulations.

Design and operating requirements

Under 40 CFR 264.221, facilities will need to submit information to EPA or the authorized State if they seek an exemption from the liner and/or leachate system requirements specified in §264.221(a), (c), or (e). Since permitted facilities submit applications for exemption from the liner and/or leachate system requirements with their part B permit application, data items and activities associated with preparing and submitting applications for exemption from the liner and/or leachate system requirements are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, the owner or operator of the surface impoundment must use the weekly or monthly flow rates from the monitoring data obtained under §264.226(d) and calculate average daily flow rates (in gallons per acre per day), in accordance with §264.222(b). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period, and monthly during the post-closure care period, if the unit is closed in accordance with section 264.228(b), and when required under section 264.226(d).

(i) Data item:

The data item required to comply with this requirement is:

- Estimate of the average daily flow rates weekly during the active life and closure period, and monthly during the post-closure care period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate the average daily flow rates as required by §264.222(b).

Completion and submittal of the Response Action Plan and recordkeeping of response actions

Section 264.223(a) require the owner or operator of each new surface impoundment unit, each replacement of an existing surface impoundment unit, and each lateral expansion of a surface impoundment unit subject to section 264.221(a) to prepare a Response Action Plan (RAP). The plan

must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under §264.223(b). Permitted facilities and facilities seeking initial permits must submit the RAP for EPA approval in a Part B permit application or modification before the receipt of waste. Data items and respondent activities associated with preparing and submitting the RAP are covered in the “Part B Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

#### Action leakage reporting

In the event the flow rate into the leak detection system exceeds the action leakage rate (ALR), section 264.223(b) requires the owner or operator to undertake the following activities.

(i) Data items:

Data items required to comply with this requirement include:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as to the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned;
- Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as specified in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §264.223(b)(1);
- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required by §264.223(b)(2);

- Determine, to the extent practicable, the location, size and cause of any leak, as required by §264.223(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §264.223(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs(b)(3), (4), and (5), the results of the actions taken, and actions planned, and monthly thereafter as required by §264.223(b)(6).

Remediation determination analyses

Under 40 CFR 264.223(b)(3), (4), and (5), owners and operators must make leak and/or remediation determinations.

(i) Data items:

Data items required to comply with the requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and
- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities when conducting remediation determination analyses:

- Perform the following activities to make leak and/or remediation determinations:

--                      Assess the source of liquids and amounts of liquids, as required by sections 264.223(c)(1)(i);

- Conduct a fingerprint, hazardous constituent, or other analyses, as required by section 264.223(c)(1)(ii); and
- Assess the seriousness of any leaks, as required by sections 264.223(c)(1)(ii).

OR

- Document why assessments above are not needed, as required by §264.223(c)(1)(iii).

#### Dike re-certification

Under 40 CFR 264.226(c) surface impoundment owner/operators must, prior to issuance of a permit and after any extended period of time in which the impoundment was not in use, obtain a certification from a qualified engineer that the impoundment's dike has sufficient structural integrity. Since permitted facilities submit these certifications prior to or with their part B permit application, data items and activities associated with preparing and submitting these certifications are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (EPA ICR Number 1573). The burden associated with re-certifying dikes after extended periods of non-use is covered in this ICR.

##### (i) Data item:

The data item required to comply with this requirement includes:

- A certification from a qualified engineer that the impoundment's dike, including any portion of the dike that provides freeboard, has structural integrity according to the standards detailed in §264.226(c)(1) and (2).

##### (ii) Respondent activities:

To fulfill this requirement, permittees will need to perform the following activities:

- Obtain the certification from a qualified engineer; and
- File and maintain certification and related data at the unit.

#### Monitoring and inspection

Section 264.226(a) and (b) require owners and operators of facilities that use surface impoundments to inspect their units and to record the specified inspection activities. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571).

##### i Data items:

Data items required to comply with these requirements include:

v Records pertaining to inspections done during the construction and installation of liners (except in the case of existing portions of surface impoundments exempt from §264.221(a)) and cover systems (e.g., membranes, sheets, or coatings) for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials) (§264.226(a));

vi Records pertaining to the inspection of synthetic liners and covers to ensure tight seams and joints and the absence of tears, punctures, or blisters immediately after construction and installation (§264.226(a));

vii Records pertaining to the inspection of soil-based and admixed liners and covers for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover immediately after construction and installation (§264.226(a)); and

viii Records pertaining to the inspection of the surface impoundment weekly and after storms while it is in operation to detect evidence of any of the following (§264.226(b)):

- Deterioration, malfunctions, or improper operation of overtopping control systems;
- Sudden drops in the level of the impoundment's contents; and
- Severe erosion or other signs of deterioration in dikes or other containment devices.

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

ix Record all inspection data.

Emergency repairs and contingency plans

40 CFR 264.227 details criteria applicable to during emergency situations (i.e., those in which there is a precipitous drop in liquid levels or the impoundment is known to be leaking).

In addition, §264.227(d)(2)(ii) stipulates that no surface impoundment that contains a liner system and has been removed from service under §264.227(a)(1) may be restored to service unless the repaired liner system is certified by an engineer as meeting the design specifications approved in the permit.

(i) Data items:

For each surface impoundment removed from service under §264.227(a) owner/operators must, in addition to complying with other requirements, provide the following data item:

- A written notification to the Regional Administrator of a surface impoundment's removal from service.

The data item required under §264.227(d)(2)(ii) includes:

- A certification by a qualified engineer that the repaired liner system meets the design specifications approved in the permit.

(ii) Respondent activities:

In order to complete this notification, permittees will need to engage in the following activities:

- Within seven days, notify the Regional Administrator in writing of a surface impoundment's removal from service; and
- File and maintain related data.

Respondents must perform the following activities in recertifying dikes:

- Obtain certification of the dike's sufficient structural integrity; and
- Maintain the certification on file.

OR

- Obtain a liner repair certification, as required under §264.227(d)(2)(ii); and
- Maintain the certification on file.

Closure

Under 40 CFR 264.113(e) an owner or operator of a hazardous waste surface impoundment that is not in compliance with the liner and leachate collection system requirements in 42 U.S.C. 3004(o)(1) and 3005(j)(1) or 2 U.S.C. 3004(o)(2) or (3) or 3005(j)(2), (3),(4), or (13) must implement closure and corrective action measures.

(i) Data items:

The data items required to comply with these requirements are:

- A contingent corrective measures plan, unless a corrective action plan has already been submitted under;
- A plan for removing hazardous wastes in compliance with paragraph (e)(2) of this section;
- An extension request, based on a demonstration that the removal of hazardous wastes will, of necessity, take longer than the allotted period to complete and that an extension will not pose a threat to human health and the environment; and



- A semi-annual report to the Regional Administrator that describes the progress of the corrective action program.
- (ii) Respondent activities:
- Prepare and submit a contingent corrective measures plan in accordance with §264.113(e)(1)(i);
  - Prepare and submit a hazardous waste removal plan in accordance with §264.113(e)(1)(ii);
  - Prepare and submit an extension request, as specified in §264.113(e)(3); and
  - Prepare and submit a corrective action report twice per year, as required by §264.113(e)(5).

Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027

40 CFR 264.231 prohibits placing F020, F021, F022, F023, F026, and F027 wastes in any surface impoundment unless the owner/operator operates the impoundment in accordance with a management plan approved by the Regional Administrator. Since the waste management plan is submitted with the Part B permit application, data items and respondent activities associated with this requirement are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (1573).

Air emission standards

40 CFR 264.232 requires owners and operators of permitted facilities to manage all hazardous waste placed in a surface impoundment in accordance with the applicable requirements of 40 CFR part 264, Subparts BB and CC. All data items and respondent activities under Subpart BB, as applicable to surface impoundments, are covered later in this ICR under equipment leaks. Data items and respondent activities under Subpart CC, as applicable to surface impoundments, are covered in the Supporting Statement for EPA ICR Number 1593: “Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC.”

**WASTE PILES**

**Interim status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart L is expected to read the regulations.

Waste analysis

40 CFR 265.252 requires interim status waste pile owner/operators to analyze a representative sample of waste from each incoming movement before adding the waste to any existing pile, unless (1) the only wastes the facility receives which are amenable to piling are compatible with each other, or (2) the waste received is compatible with the waste in the pile to which it is to be added. The analysis conducted must be able to differentiate between the types of hazardous waste the owner or operator places in piles, so that mixing of incompatible waste does not inadvertently occur. The analysis must include a visual comparison of color and texture. These waste analyses are in addition to the analyses required under §265.13.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with these requirements includes:

- Waste analysis data from each incoming movement before adding the waste to any existing pile.

(ii) Respondent activity:

Respondents must perform the following activity in gathering these data:

- Conduct waste analyses.

Exemption from design and operating requirements

40 CFR 265.254 requires waste piles to comply with the regulations established 40 CFR 264.251 by having liners and leachate collection and removal systems sufficient to prevent any waste migration for the active life of the pile (including the closure period). It also details design, construction, and installation requirements for the liners and collection systems. 40 CFR 265.254 also exempts waste piles from the requirements in paragraph §264.251(a) if the owner/operator can demonstrate to the Regional Administrator that alternate design and operating practices, together with location characteristics, will prevent hazardous constituents from migrating into the ground or surface water at any future time. Though the regulations provide no specific details regarding the demonstrations' content, they do list information that the Regional Administrator will consider in deciding whether to grant an exemption. This ICR assumes that respondents will include this information when submitting their demonstration.

(i) Data items:

The data items required for an exemption from §264.251(a) are:

- Information regarding the nature and quantity of the wastes;
- The proposed alternate design and operation;
- The unit's hydrogeologic setting, including attenuative capacity and thickness of the liners and soils present between the pile and ground water or surface water; and

- All other factors that would influence the quality and mobility of the leachate produced and the potential for it to migrate to ground water or surface water.

(ii) Respondent activities:

Respondents must perform the following activities in making this demonstration:

- Gather the information necessary to provide adequate demonstration; and
- Submit the information to the Regional Administrator.

Variance from design and operating requirements

40 CFR 265.254 also allows waste piles to seek a variance from the liner/leachate system design requirements in 40 CFR 264.251(a) by submitting an alternative design or operating practices to the Regional Administrator for approval, as long as the alternative complies with the requirements contained in 40 CFR 264.251(d). Though the regulations provide no specific details regarding the variance's content, they do list information that the Regional Administrator will consider in deciding whether to grant a variance. This ICR assumes that respondents will include this information when submitting their demonstration.

(i) Data item:

The data item required in making the demonstration includes:

- Demonstration of alternative design or operating practices.

(ii) Respondent activities:

Respondents must perform the following activities in making this demonstration:

- Gather the information necessary for demonstrating an alternative design; and
- Submit the information to the Regional Administrator.

Developing and submitting action leakage rates

Pursuant to section 265.255(a), the owner or operator of each new and replacement waste pile and each lateral expansion of a waste pile subject to §265.254 must propose an action leakage rate (ALR) to EPA when submitting the notice required under §265.254 for interim status facilities. After 60 days from the notification date, the ALR will be established as proposed by the interim status owner or operator, unless otherwise acted upon by EPA. In addition, §265.73 requires owners and operators to maintain records of all monitoring, testing, or analytical data, and corrective action in connection with action leakage rates, as required under §265.255.

(i) Data item:

The data item required to comply with this requirement is:

- A proposed action leakage rate (ALR) that is the maximum design flow rate that the leak detection system (LDS) can remove without the fluid head on the bottom liner exceeding one (1) foot, allowing for an adequate safety margin to allow for uncertainties in the design, construction, operation, and location of the LDS; waste and leachate characteristics; likelihood and amounts of other sources of liquids in the LDS; and proposed response actions.

(ii) Respondent activities:

Respondents must perform the following activities for developing action leakage rates:

- Develop and submit to EPA a proposed action leakage rate, as specified in section 265.255; and
- Maintain results of analyses, as required by §265.73.

#### Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, the owner or operator of the waste pile must use the weekly flow rates from the monitoring data obtained under §265.260 and calculate average daily flow rates (in gallons per acre per day), in accordance with §265.255(c). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period.

(i) Data item:

The data item required to comply with this requirement is:

- Estimate of the average daily flow rates weekly during the active life and closure period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate the average daily flow rates, as required by §265.255(c).

#### Completion and submittal of the Response Action Plan and recordkeeping of response actions

Section 265.259(a) requires the owner or operator of each new waste pile unit, each replacement of an existing waste pile unit, and each lateral expansion of a waste pile unit subject to section 265.254 to prepare and submit to EPA a Response Action Plan (RAP). The plan must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under section 265.259(b). Interim status facilities must submit the RAP to EPA when submitting the ALR under §265.255.

(i) Data item:

The data item required to comply with this requirement is:

- Response Action Plan.
  - (ii) Respondent activities:
- Develop Response Action Plan;
- Submit Response Action Plan to the Regional Administrator; and
- Maintain a copy of the Response Action Plan and records of analyses.

Action leakage reporting

In the event the flow rate into the leak detection system exceeds the action leakage rate, section 265.259(b) requires the owner or operator to collect the following data items.

(i) Data items:

The following data items are required if the action leakage rate is exceeded:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned;
- Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as outlined in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §265.259(b)(1);
- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required by §265.259(b)(2);
- Determine, to the extent practicable, the location, size and cause of any leak, as required by §265.259(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §265.259(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs(b)(3), (4), and (5), the results of the actions taken, and actions planned, and monthly thereafter as required by §265.259(b)(6).

Remediation determination analyses

Under 40 CFR 265.259(b)(3), (4), and (5), owners and operators must make leak and/or remediation determinations.

(i) Data items:

Data items required to comply with these requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and
- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities when conducting remediation determination analyses:

- Perform the following activities to make leak and/or remediation determinations:
    - Assess the source of liquids and amounts of liquids, as required by sections 265.259(c)(1)(i);
    - Conduct a fingerprint, hazardous constituent, or other analyses, as required by section 265.259(c)(1)(ii); and
    - Assess the seriousness of any leaks, as required by section 265.259(c)(1)(ii).
- OR
- Document why assessments above are not needed, as required by §265.259(c)(1)(iii).

#### Monitoring and inspections

Section 265.260 requires owners or operators of each new waste pile unit, each replacement of an existing waste pile unit, and each lateral expansion of a waste pile unit required to have leak detection systems under §265.254 to record specified inspection activities. In addition, section 265.73 require owners or operators to maintain records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under section 265.260.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with these requirements is:

- Records pertaining to the level of any liquids in the leak detection system removal sumps and the amount of liquids removed from the LDS sumps each week during the active life and closure period, as specified in §265.260.

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

- Record the level of any liquids in the leak detection system removal sumps and the amount of liquids removed from the LDS sumps each week during the active life and closure period, as required by §265.260.

#### **Permitted facilities:**

##### Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart L is expected to read the regulations.

#### Exemption from design and operating requirements

40 CFR 264.251(a) requires owner/operators to comply with the provisions in 40 CFR 264.251. Under 40 CFR 264.251(a), owner/operators with waste piles subject to Subpart L are required to have liners and leachate collection and removal systems sufficient to prevent any waste migration for the active life of the pile (including the closure period). This citation also details design, construction, and installation requirements for the liners and collection systems. 40 CFR 264.251(b) exempts waste piles from the requirements in §264.251(a) if the owner/operator can demonstrate to the Regional Administrator that alternate design and operating practices, together with location characteristics, will prevent hazardous constituents from migrating into the ground or surface water at any future time. Since permitted facilities submit applications for exemption from 40 CFR 264.251 with their part B permit application, data items and activities associated with this exemption are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

#### Variance from design and operating requirements

40 CFR 264.251(d) allows owner/operators of waste piles to seek a variance from the liner/leachate system requirements by submitting an alternative design or operating practices, as long as the alternative complies with the requirements given in section 264.251(d). Since permitted facilities submit applications for variance from 40 CFR 264.251 with their part B permit application, data items and activities associated with this variance are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

#### Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, the owner or operator of the waste pile must use the weekly flow rates from the monitoring data obtained under §264.254(c) and calculate average daily flow rates (in gallons per acre per day), in accordance with §264.252(b). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period.

(i) Data item:

The data item required to comply with this requirement is:

- Estimate of the average daily flow rates weekly during the active life and closure period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate the average daily flow rates as required by §264.252(b).

#### Completion and submittal of the Response Action Plan and recordkeeping of response actions



Section 264.253(a) requires the owner or operator of each new waste pile unit, each replacement of an existing waste pile unit, and each lateral expansion of a waste pile unit subject to section 264.253(c) or (d) to prepare and submit to EPA a Response Action Plan (RAP). The plan must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under §264.253(b). Permitted facilities and facilities seeking initial permits must submit the RAP for EPA approval in a Part B permit application or modification before the receipt of waste. Data items and respondent activities associated with preparing and submitting the RAP are covered in the “Part B Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

#### Action leakage reporting

In the event the flow rate into the leak detection system exceeds the action leakage rate, section 264.253(b) requires the owner or operator to collect the following data items.

(i) Data items:

The following data items are required if the action leakage rate is exceeded:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned;
- Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as outlined in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §264.253(b)(1);

- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required by §264.253(b)(2);
- Determine, to the extent practicable, the location, size and cause of any leak, as required by §264.253(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §264.253(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs (b)(3), (4), and (5), the results of the actions taken, and actions planned, and monthly thereafter as required by §264.253(b)(6).

Remediation determination analyses

Under 40 CFR 264.253(b)(3), (4), and (5), owners and operators must make leak and/or remediation determinations.

(i) Data items:

Data items required to comply with these requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and
- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities when conducting remediation determination analyses:

- Perform the following activities to make leak and/or remediation determinations:

- Assess the source of liquids and amounts of liquids, as required by sections 264.253(c)(1)(i);
- Conduct a fingerprint, hazardous constituent, or other analyses, as required by sections 264.253(c)(1)(ii); and
- Assess the seriousness of any leaks, as required by sections 264.253(c)(1)(ii).

OR

- Document why assessments above are not needed, as required by §264.253(c)(1)(iii).

#### Monitoring and inspections

Section 264.254(a) and (b) require owners and operators of facilities that use waste piles to inspect their units and to record the specified inspection activities. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

- i Records pertaining to inspections done during the construction and installation of liners (except in the case of existing portions of surface impoundments exempt from §264.251(a)) and cover systems (e.g., membranes, sheets, or coatings) for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials) (§264.254(a));
- ii Records pertaining to the inspection of synthetic liners and covers to ensure tight seams and joints and the absence of tears, punctures, or blisters immediately after construction and installation (§264.254(a));
- iii Records pertaining to the inspection of soil-based and admixed liners and covers for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover immediately after construction and installation (§264.254(a)); and
- iv Records pertaining to the inspection of the waste pile weekly and after storms while it is operation to detect evidence of any of the following (§264.254(b)):
  - Deterioration, malfunctions, or improper operation of run-on and run-off control systems;
  - Proper functioning of wind dispersal control systems, where present; and

-- The presence of leachate in and proper functioning of leachate collection and removal systems, where present.

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

- v Record all inspection data.

Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027

40 CFR 264.259 prohibits placing F020, F021, F022, F023, F026, and F027 wastes in any waste pile unless the owner/operator operates the waste pile in accordance with a management plan approved by the Regional Administrator. Since the waste management plan is submitted with the Part B permit application, data items and respondent activities associated with this requirement are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (1573).

## **LAND TREATMENT**

### **Interim status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart M is expected to read the regulations.

Waste analysis

40 CFR 265.273 requires owners and operators of interim status land treatment units to conduct waste analyses (in addition to the waste analyses required under §265.13) before placing a hazardous waste in or on a land treatment facility. The waste analysis results must be used to determine: (1) the concentrations in the waste of any substances that cause a waste to exhibit the Toxicity Characteristic; (2) the concentrations of any substances which caused the waste to be listed as a hazardous waste; and (3) if food chain crops are grown, the concentrations in the waste of arsenic, cadmium, lead, and mercury, unless the owner or operator has written, documented data that show that the constituent is not present.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

- Waste analysis data for waste placed in or on a land treatment unit; and

If food chain crops are grown and arsenic, cadmium, lead, and mercury are not present in the waste:

- Documentation indicating that these constituents are not present in the waste.

(ii) Respondent activities:

Respondents must perform the following activities in complying with the §265.273 requirements:

- Conduct waste analyses; and

If food chain crops are grown and arsenic, cadmium, lead, and mercury are not present in the waste:

- Obtain and maintain documentation indicating that these constituents are not present in the waste.

#### Food-chain crops

40 CFR 265.276 regulates the growth of food-chain crops at interim status hazardous waste land treatment facilities. Owner/operators must notify the Regional Administrator if crops are grown, or have been grown and will be grown again, on the unit. These owner/operators must also keep records of the information necessary to make a demonstration under 40 CFR 265.276(b)(1) at the unit, as stated below, but are under no regulatory obligation to submit this information to EPA.

(i) Data items:

The data items for these requirements include:

- Notification, within 60 days of obtaining interim status, that food chain crops are being grown, or have been grown and will be grown in the future, on the unit (40 CFR 265.276(a));
- A record maintained at the interim status unit of all information necessary to demonstrate, based on field testing, that arsenic, lead, mercury, or other constituents identified under 40 CFR 265.273(b): (1) will not be transferred to the food portion of the crop by plant uptake or direct contact and will not be ingested by food chain animals, or (2) that these constituents will not occur in greater concentrations in the crops grown on the land treatment unit than in the same crops grown on untreated soils under similar conditions in the same region (§265.276(b)(1)). This report must include:

-- Descriptions of crop and soil characteristics;

-- Sample selection criteria;

-- Sample size determination;

-- Analytical methods; and

--

#### Statistical procedures.

Under section 265.276(c)(2)(iii) owner/operators must develop an operating plan that demonstrates how the animal feed will be distributed to preclude ingestion by humans.

#### (ii) Respondent activities:

Respondents must perform the following activities in complying with the §265.276 requirements:

- Prepare the notification required under 40 CFR 265.276(a) and submit it to EPA;
- Compile the information necessary to make the demonstration required under 40 CFR 265.276(b)(1);
- Maintain records of the information collected for the demonstrations; and
- Develop an operating plan as specified in §265.276(c)(2)(iii).

#### Unsaturated-zone monitoring

Owner/operators subject to the unsaturated-zone monitoring requirements of 40 CFR 265.278 must establish an unsaturated-zone monitoring program to determine whether hazardous constituents migrate out of the treatment zone. The interim status regulations require no reports to be submitted to EPA, but owner/operators must maintain a record of the plan at the unit.

#### (i) Data items:

The data items for these requirements include:

- A written record of the unsaturated-zone monitoring plan and the rationale used in developing this plan, which must be kept at the unit (§265.278(d)). The plan must include soil-core monitoring and soil-pore water monitoring.

#### (ii) Respondent activities:

Respondents must perform the following activities in compiling the unsaturated-zone monitoring record:

- Develop an unsaturated-zone monitoring plan; and
- File the written plan at the unit.

#### Closure and post-closure care

40 CFR 265.280 regulates closure and post-closure care at interim status hazardous waste land treatment facilities. The regulations require owner/operators to provide EPA with certification of closure when unit closure is completed.

(i) Data items:

The data items for this requirement include:

- Certification by both an independent qualified scientist, in lieu of an independent registered professional engineer, and the owner/operator that the unit has been closed in accordance with the specifications in the approved closure plan (§265.280(e)).

(ii) Respondent activities:

Respondents must perform the following activities in complying with §265.280:

- Obtain certification of closure from a qualified scientist;
- Produce owner/operator's certification of closure; and
- Submit certification(s) to EPA.

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart M is expected to read the regulations.

Food-chain crops

40 CFR 264.276 regulates the growth of food-chain crops at permitted hazardous waste land treatment facilities. Since the owner/operator must make the demonstrations outlined in §264.276(a) prior to submitting the Part B permit application, data items and activities associated with this demonstration are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (EPA ICR Number 1573). The burden associated with maintaining (i.e., filing and photocopying) this documentation is covered in this ICR.

Under section 264.276(b)(2)(iii), owner/operators must develop and maintain an operating plan that demonstrates how the animal feed will be distributed to preclude ingestion by humans.

(i) Data items:

- Operating plan that demonstrates how the animal feed will be distributed to preclude ingestion by humans.

(ii) Respondent activities:

- Maintain food-chain crop documentation at the facility; and
- Develop and maintain an operating plan.

### Unsaturated-zone monitoring

Owner/operators of permitted facilities subject to the unsaturated-zone monitoring requirements of 40 CFR 264.278 must establish an unsaturated-zone monitoring program to determine whether hazardous constituents migrate out of the treatment zone. These owner/operators must notify EPA whenever they determine that there is a statistically significant increase of hazardous constituents below the treatment zone, and must (1) submit a permit modification application to modify the operating practices at the unit, or (2) submit a report to EPA demonstrating that the source of the increase is not the regulated unit. If, however, the demonstration does not show that a source other than the regulated units or some error in sampling, analysis, or evaluation caused the increase in hazardous constituents, the owner/operator must submit the permit modification request within the specified time period.

(i) Data items:

Data items for these requirements include:

- Notification of statistically significant increases of hazardous waste constituents below the treatment zone. This notification must be made within seven days and must include information on what constituents have shown statistically significant increases (§264.278(g)(1));
- An application for a permit modification, submitted within 90 days, to modify operating practices at the unit in order to maximize the success of degradation, transformation, or immobilization processes in the treatment zone (§264.278(g)(2));
- Notification of intent to demonstrate that the increase was not caused by the regulated units. This notification must be submitted within seven days of identifying the increase (§264.278(h)(1)); and
- A report, submitted within 90 days, demonstrating that a source other than the regulated units caused the increase or that the increase resulted from error in sampling, analysis, or evaluation (§264.278(h)(2)).

(ii) Respondent activities:

Respondents must perform the following activities in complying with these notification, report, and application requirements:

- Prepare and submit a notice of statistically significant increases in the concentration of hazardous constituents;
- Prepare and submit notice of intent to make a demonstration under 40 CFR 264.278(h); and



- Prepare and submit a report demonstrating that a source other than the regulated units caused the increase or that the increase resulted from error in sampling, analysis, or evaluation.

#### Closure and post-closure care

40 CFR 264.280 regulates closure and post-closure care at hazardous waste land treatment facilities. The regulations require owner/operators to provide EPA with certification of closure when unit closure is completed. The regulations also allow exemptions from both the requirement to establish a vegetative cover (§264.280(a)(8)), and the post-closure care requirements (§264.280(c)) if facilities make the appropriate demonstrations.

#### (i) Data items:

Data items for these requirements include:

- Certification by an independent qualified scientist, in lieu of an independent registered professional engineer, that the unit has been closed in accordance with the specifications in the approved closure plan (§264.280(b)); and
- For exemption from the vegetative cover and post-closure requirements, a demonstration that the level of hazardous constituents in the treatment zone soil does not exceed the background value of those constituents by a statistically significant amount (§264.280(d)). This demonstration may be submitted at any time during the closure or post-closure care periods.

#### (ii) Respondent activities:

Respondents must perform the following activities in complying with these requirements:

- Obtain certification of closure from a qualified scientist;
- Submit the certification(s) to EPA; and
- If applying for a demonstration under §264.280(d), prepare the demonstration and submit it to EPA.

#### Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027

40 CFR 264.283 prohibits placing F020, F021, F022, F023, F026, and F027 wastes in any land treatment unit unless the owner/operator operates the unit in accordance with a management plan approved by the Regional Administrator. Since the waste management plan is submitted with the Part B permit application, data items and respondent activities associated with this requirement are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (1573).

## **LANDFILLS**

### **Interim status facilities:**

## Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart N is expected to read the regulations.

## Design requirements

40 CFR 265.301 requires owner operators of interim status landfills to install two or more liners and leachate collection systems above and between the liners if they (1) plan to replace an existing unit, (2) laterally expand an existing unit, or (3) install a new unit. The section provides for an exemption from these requirements if the owner/operator can demonstrate to the Regional Administrator that alternative design and operating practices, together with location characteristics, will prevent the migration of hazardous constituents as effectively as do the liners and leachate collection systems. In addition, the regulations provide for a double liner requirement waiver for monofills (in certain instances). Under §265.301(b), these facilities also must notify the Regional Administrator at least 60 days before receiving waste, and file a Part B permit application within 6 months of EPA's receipt of the notice (the Part B information collection activities are described in a separate ICR (EPA ICR Number 1573)).

Under §265.301(d), the double liner requirement in §265.301(a) may be waived for any monofill if: (1) the monofill contains only hazardous wastes described in §265.301(d)(1), and (2) the monofill has at least one non-leaking liner, and (3) the monofill is located more than one-quarter mile from an underground source of drinking water, and (4) the monofill complies with the appropriate ground water monitoring requirements under RCRA §3005(c) **or** the owner/operator demonstrates that the monofill is located, designed, and operated so as to assure that there will be no migration of any hazardous constituent into ground water or surface water at any future time.

### (i) Data items:

Data items required for the notification of intent to receive waste are:

- A notification to the Regional Administrator at least 60 days prior to receiving waste.

The data items necessary to gain an exemption under §265.301(c) from the liner and leachate collection system requirements are:

- The proposed alternate design and operating practices; and
- Information concerning the landfill's location characteristics.

The data item required for the waiver demonstration under §265.301(d) includes:

- Information regarding the monofill's location, design, and operation as may be necessary to make the demonstration.

### (ii) Respondent activities:

Respondents will need to engage in the following activities to comply with the §265.301 notification requirement:

- Prepare the notification and submit it to the Regional Administrator.

Respondents must perform the following activities in applying for an exemption from the liner and leachate collection system requirements:

- Collect the required information; and
- Submit the information to the Regional Administrator.

Respondents must perform the following activities in order to be granted a waiver from the double liner requirements:

- Collect the required information; and
- Submit the information to the Regional Administrator.

#### Developing and submitting action leakage rates

As required by section §265.302(a), the owner or operator of each new and replacement landfill and each lateral expansion of a landfill subject to §265.301 (a) must submit an action leakage rate (ALR) proposal and rationale to EPA when submitting the notice required under §265.301 (b) for interim status facilities. After 60 days from the notification date, the ALR will be established as proposed by the interim status owner or operator unless otherwise acted upon by EPA. In addition, section 265.73 requires owners or operators to maintain records of all monitoring, testing, or analytical data, and corrective action in connection with the ALR as required under §265.302.

#### (i) Data item:

The data item required to comply with these requirements is:

- A proposed action leakage rate (ALR) that is the maximum design flow rate that the leak detection system (LDS) can remove without the fluid head on the bottom liner exceeding one (1) foot, allowing for an adequate safety margin to allow for uncertainties in the design, construction, operation, and location of the LDS; waste and leachate characteristics; likelihood and amounts of other sources of liquids in the LDS; and proposed response actions.

#### (ii) Respondent activities:

Respondents must perform the following activities when developing action leakage rates:

- Develop and submit to EPA a proposed action leakage rate and rationale, as specified in §265.302; and
- Maintain results of analyses, as required by §265.73.

#### Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, section 265.302(c) requires the owner or operator of each landfill unit to use the weekly or monthly flow rates from the monitoring data obtained under §265.304(b) and calculate average daily flow rates (in gallons per acre per day). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period, and monthly during the post-closure care period, if the unit is closed in accordance with section 265.310(b)(2), and when required under section 265.304(b).

(i) Data item:

The data item required to comply with these requirements is:

- Estimate of the average daily flow rates weekly during the active life and closure period, and monthly during the post-closure care period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate the average daily flow rates as required by §265.302(c).

Completion and submittal of the Response Action Plan and recordkeeping of response actions

Section 265.303(a) requires the owner or operator of each new landfill unit, each replacement of an existing landfill unit, and each lateral expansion of a landfill unit subject to section 265.301(a) to prepare a Response Action Plan (RAP). The plan must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under §265.303(b). Interim status facilities must submit the RAP to EPA when submitting the ALR under §265.302.

(i) Data item:

The data item required to comply with these requirements is:

- Response Action Plan.

(ii) Respondent activities:

- Develop Response Action Plan;
- Submit Response Action Plan to the Regional Administrator; and
- Maintain a copy of the Response Action Plan and records of analyses.

Action leakage reporting

40 CFR 265.303(b) requires the owner or operator to collect certain information in the event the flow rate into the leak detection system exceeds the action leakage rate.

(i) Data items:

The following data items are required if the action leakage rate is exceeded:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned; Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as outlined in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §265.303(b)(1);
- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required by §265.303(b)(2);
- Determine, to the extent practicable, the location, size and cause of any leak, as required by §265.303(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §265.303(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs(b)(3), (4), and (5),

the results of the actions taken, and actions planned, and monthly thereafter as required by §265.303(b)(6).

Remediation determination analyses

Under 40 CFR 265.303 (b)(3), (4) and (5), owners and operators must make the leak and/or remediation determinations.

(i) Data items:

Data items required to comply with these requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and
- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities to make leak and/or remediation determinations:

- Perform the following activities to make leak and/or remediation determinations:
  - Assess the source of liquids and amounts of liquids, as required by section §265.303(c)(1)(i);
  - Conduct a fingerprint, hazardous constituent, or other analyses, as required by section §265.303(c)(1)(ii); and
  - Assess the seriousness of any leaks, as required by section 265.303(c)(1)(ii).

OR

- Document why assessments above are not needed, as required by §265.303(c)(1)(iii).

Monitoring and inspections

Section 265.304 requires owners or operators of each new landfill unit, each replacement of an existing landfill unit, and each lateral expansion of a landfill unit required to have a leak detection system under §265.301(a) to record inspection activities as specified in the regulations. In addition, section 265.73 require owners and operators to maintain records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under section 265.304.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required to comply with these requirements include:

- Records pertaining to the level of liquids in the leak detection system removal sumps and the amount of liquids removed from the LDS sumps each operating week during the active life and closure period, as specified in §265.304(a); and, if applicable, at least monthly during the post-closure care period, at least quarterly if the liquid level in the sump stays below the pump operating level for two consecutive months, or at least semi-annually if the liquid level in the sump stays below the pump operating level for two consecutive quarters, as specified in §265.304(b); and
- Recordkeeping, as required by 265.73, of records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities as required under section 265.304.

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

- Record the level of liquids in the leak detection system removal sumps and the amount of liquids removed from the LDS sumps each operating week during the active life and closure period, as required by §265.304(a); and, if applicable, at least monthly during the post-closure care period, at least quarterly if the liquid level in the sump stays below the pump operating level for two consecutive months, or at least semi-annually if the liquid level in the sump stays below the pump operating level for two consecutive quarters, as specified in §265.304(b).

Developing and submitting pump operating levels

Section 265.304(c) requires owners or operators of each new landfill unit, each replacement of an existing landfill unit, and each lateral expansion of a landfill unit required to have leak detection systems (LDS) under section 265.301 (a) to submit pump operating level proposals, with rationale, to EPA when submitting the action leakage rate proposal required under §265.302(a). In addition, section 265.73 requires owners and operators to maintain records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under sections 265.304.

(i) Data items:

The data items required to comply with these requirements include:

- A proposed pump operating level that is a liquid level based on the pump activation level, sump dimensions, and level that avoids backup into the drainage layer and that minimizes the head in the sump; and
- Recordkeeping, as required by §265.73, of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities required under section 265.304.

(ii) Respondent activities:

Respondents must perform the following activities when developing pump operating levels:

- Develop and submit to the Regional Administrator a pump operating level and rationale, as specified in section 265.304(c); and
- Maintain records of all monitoring, testing, or analytical data, and corrective action associated with the monitoring and inspection activities, in accordance with section §265.73.

Special requirements for bulk and containerized liquids

40 CFR 265.314(b) prohibits disposing bulk or containerized liquid hazardous waste or hazardous waste containing free liquids in any landfill. 40 CFR 265.314(d) requires owner/operators to demonstrate the absence or presence of free liquids in bulk or containerized waste, using EPA Method 9095 (Paint Filter Liquids Test) as described in “Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods” (EPA Publication No. SW-846).

In addition, 40 CFR 265.314(f) prohibits placing non-hazardous liquid waste in a landfill unless the landfill owner/operator can demonstrate to the Regional Administrator, or the Regional Administrator determines, that: (1) the only reasonably available alternative is placing the waste in another landfill that contains or is expected to contain hazardous waste, and (2) placing the waste in the owner/operator’s landfill will not risk contaminating any underground source of drinking water. The regulations do not specify the exact form this demonstration must take; depending on the circumstances surrounding each demonstration, the effort and data required to gain an exemption may vary. This ICR assumes that owner/operators will present information regarding (1) the situational constraints that necessitate disposing the waste in a landfill containing hazardous waste (e.g., the lack of access to any other suitable disposal arrangement), and (2) hydrogeological and other information sufficient to show that doing so cannot contaminate any underground source of drinking water.

(i) Data items:

The data items for demonstrating the absence of free liquids include:

- Results of the Paint Filter Liquids Test, performed as specified in SW-846.



The data items required for the demonstration under 40 CFR 265.314(f) include:

- Information sufficient to show that the only reasonably available alternative to placing the waste in the owner/operator's landfill would be to place the waste in another landfill or unlined surface impoundment that contains or is expected to contain hazardous waste; and
- Information sufficient to show that placing the waste in the owner/operator's landfill will not present a risk of contamination of any underground source of drinking water.

(ii) Respondent activities:

Respondents must perform the following activities in performing the no-free-liquids demonstration:

- Record and file the observation results.

Respondents must perform the following activities in order to gain an exemption from the requirements in §265.314(f):

- Gather the information necessary to make the demonstration; and
- Submit the information to the Regional Administrator.

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart N is expected to read the regulations.

Calculating average daily flow rates

To determine if the action leakage rate has been exceeded, section 264.302(b) requires the owner or operator of each landfill unit to use the weekly or monthly flow rates from the monitoring data obtained under §264.303(c)(2) and calculate average daily flow rates (in gallons per acre per day). Unless EPA specifies otherwise, the average daily flow rates for each sump must be calculated weekly during the active life and closure period, and monthly during the post-closure care period, if the unit is closed in accordance with section 264.310(b)(3), and when required under section 264.303(c)(1).

(i) Data item:

The data item required to comply with these requirements is:

- Estimate of the average daily flow rates weekly during the active life and closure period, and monthly during the post-closure care period.

(ii) Respondent activity:

Respondents must perform the following activity:

- Calculate the average daily flow rates as required by §264.302(b).

Monitoring and inspection

Section 264.303(a) and (b) require owners and operators of facilities that have landfills to inspect their units and to record the specified inspection activities. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

- i Records pertaining to inspections done during the construction and installation of liners (except in the case of existing portions of surface impoundments exempt from §264.301(a)) and cover systems (e.g., membranes, sheets, or coatings) for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials) (§264.303(a));
- ii Records pertaining to the inspection of synthetic liners and covers to ensure tight seams and joints and the absence of tears, punctures, or blisters immediately after construction and installation (§264.303(a));
- iii Records pertaining to the inspection of soil-based and admixed liners and covers for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover immediately after construction and installation (§264.303(a)); and
- iv Records pertaining to the inspection of the waste pile weekly and after storms while it is in operation to detect evidence of any of the following (§264.303(b)):
  - Deterioration, malfunctions, or improper operation of run-on and run-off control systems;
  - Proper functioning of wind dispersal control systems, where present; and
  - The presence of leachate and proper functioning of leachate collection and removal systems, where present.

(ii) Respondent activity:

Respondents must perform the following activity for actions associated with monitoring and inspections:

- v Record all inspection data.

### Completion and submittal of the Response Action Plan and recordkeeping of response actions

Section 264.304(a) requires the owner or operator of each new landfill unit, each replacement of an existing landfill unit, and each lateral expansion of a landfill unit subject to section 264.301(c) or (d) to prepare a Response Action Plan (RAP). The plan must set forth the actions to be taken if the action leakage rate has been exceeded. It must describe, at a minimum, the actions required under §264.303(b). Permitted facilities and facilities seeking initial permits must submit the RAP for EPA approval in a Part B permit application or modification before the receipt of waste. Data items and respondent activities associated with preparing and submitting the RAP are covered in the “Part B Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

#### Action leakage reporting

40 CFR 264.304(b) requires owners and operators to collect certain information in the event the flow rate into the leak detection system exceeds the action leakage rate.

(i) Data items:

The following data items are required if the action leakage rate is exceeded:

- Notification to the Regional Administrator, in writing, of the exceedance within seven days of the determination;
- Submittal of a preliminary written assessment to the Regional Administrator within 14 days of the determination, as the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned; Determination of, to the extent practicable, the location, size, and cause of any leaks;
- Determination as to whether waste receipt should cease or be curtailed;
- Determination as to whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determination of any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
- Submittal to the Regional Administrator, within 30 days after the notification that the action leakage rate has been exceeded, the results of the analyses specified, the results of actions taken, and actions planned. As long as the ALR is exceeded, the owner or operator must submit to the Regional Administrator monthly reports summarizing the results of any remedial actions taken and actions planned.

(ii) Respondent activities:

Respondents must perform the following activities as outlined in the RAP:

- Notify the Regional Administrator, in writing, of the exceedance within seven days of the determination, as required by §264.304(b)(1);
- Submit a preliminary written assessment to the Regional Administrator within 14 days of the determination, as required by §264.304(b)(2);
- Determine, to the extent practicable, the location, size and cause of any leak, as required by §264.304(b)(3);
- Determine whether waste receipt should cease or be curtailed;
- Determine whether any waste should be removed from the unit for inspection, repairs, or controls, and whether or not the unit should be closed;
- Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks, as required by §264.304(b)(5); and
- Submit to the Regional Administrator, within 30 days after the notification that the ALR has been exceeded, the results of the analyses specified in paragraphs(b)(3), (4), and (5), the results of the actions taken, and actions planned, and monthly thereafter as required by §264.304(b)(6).

Remediation determination analyses

Under 40 CFR 264.304(b)(3), (4) and (5), owners and operators must make leak and/or remediation determinations.

(i) Data items:

Data items required to comply with these requirements include:

- Assessment of the source liquids and amounts of liquids by source;
- Execution of a fingerprint, hazardous constituent, of other analyses of the liquids in the leak detection system to identify the source of liquids and possible location of any leaks, and the hazard and mobility of the liquid; and
- Assessment of the seriousness of any leaks in terms of potential for escaping into the environment.

OR

- Documentation as to why assessments above are not needed.

(ii) Respondent activities:

Respondents must perform the following activities to make leak and/or remediation determinations:

- Perform the following activities to make leak and/or remediation determinations:
    - Assess the source of liquids and amounts of liquids, as required by section 264.304(c)(1)(i);
    - Conduct a fingerprint, hazardous constituent, or other analyses, as required by section 264.304(c)(1)(ii); and
    - Assess the seriousness of any leaks, as required by section 264.304(c)(1)(ii).
- OR
- Document why assessments above are not needed, as required by §264.304(c)(1)(iii).

Special requirements for bulk and containerized liquids

40 CFR 264.314(b) prohibits disposing bulk or containerized liquid hazardous waste or hazardous waste containing free liquids in any landfill. 40 CFR 264.314(c) requires owner/operators to demonstrate the absence or presence of free liquids in bulk or containerized waste using EPA Method 9095 (Paint Filter Liquids Test) as described in “Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods” (EPA Publication No. SW-846).

In addition, 40 CFR 264.314(e) prohibits placing non-hazardous liquid waste in a landfill unless the landfill owner/operator can demonstrate to the Regional Administrator, or the Regional Administrator determines, that: (1) the only reasonably available alternative is placing the waste in another landfill that contains or is expected to contain hazardous waste, and (2) placing the waste in the owner/operator’s landfill will not risk contaminating any underground source of drinking water. The regulations do not specify the exact form this demonstration must take; depending on the circumstances surrounding each demonstration, the effort and data required to gain an exemption may vary. This ICR assumes that owner/operators will present information regarding (1) the situational constraints that necessitate disposing the waste in a landfill containing hazardous waste (e.g., the lack of access to any other suitable disposal arrangement), and (2) hydrogeological and other information sufficient to show that doing so cannot contaminate any underground source of drinking water.

(i) Data items:

The data items for demonstrating the absence of free liquids include:

- Results of the Paint Filter Liquids Test, performed as specified in SW-846.

The data items required for the demonstration under 40 CFR 264.314(e) include:

- Information sufficient to show that the only reasonably available alternative to placing the waste in the owner/operator’s landfill would be to place the waste in another landfill or unlined surface impoundment that contains or is expected to contain hazardous waste; and

- Information sufficient to show that placing the waste in the owner/operator's landfill will not present a risk of contamination of any underground source of drinking water.

(ii) Respondent activities:

Respondents must perform the following activities in performing the no-free-liquids demonstration:

- Record and file the observation results.

Respondents must perform the following activities in order to gain an exemption from the requirements in §264.314(e):

- Gather the information necessary to make the demonstration; and
- Submit the information to the Regional Administrator.

Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027

40 CFR 264.317 prohibits placing F020, F021, F022, F023, F026, and F027 wastes in any landfill unless the landfill is operated in accordance with a management plan approved by the Regional Administrator. Since the waste management plan is submitted with the Part B permit application, data items and respondent activities associated with this requirement are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (EPA ICR Number 1573).

## **INCINERATORS**

### **Interim status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart O is expected to read the regulations.

Applicability

40 CFR Part 265, Subpart O presents interim status hazardous waste incinerator standards. Section 265.340(b) exempts incinerator owner/operators from these regulations (except §265.351--Closure).

(i) Data item:

The data item required for an exemption from the interim status incinerator requirements is:

- Written documentation that the waste to be incinerated meets the requirements listed in 40 CFR 265.340(b) and cannot reasonably be expected to contain any of the hazardous constituents listed in 40 CFR 261, Appendix VIII.

(ii) Respondent activities:

Respondents must perform the following activities in order to be exempt from these requirements:

- Determine whether the waste in question meets the requirements listed in 40 CFR 265.340(b) and Part 261, Appendix VIII, and document the fact in writing; and
- File the documentation at the unit.

Waste analysis

40 CFR 265.341 requires owner/operators of an interim status incinerator to gather waste analysis data (in addition to that required in §265.13) for hazardous waste that has not been previously burned in his incinerator to enable him to establish steady state (normal) operating conditions (including waste and auxiliary fuel feed and air flow) and to determine the type of pollutants which might be emitted. At a minimum, the waste analysis must determine:

- Heating value of the waste;
- Halogen content and sulfur content in the waste; and
- Concentrations in the waste of lead and mercury, unless the owner or operator has written, documented data that show that the element is not present.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data item:

The data item required to comply with these requirements include:

- Records of the waste analysis results.

(ii) Respondent activity:

Respondents must perform the following activity in gathering these data:

- Conduct waste analysis.

Monitoring and inspections

Section 265.347(a) and (b) require owners and operators of incinerators to conduct monitoring and inspection activities and to collect data gathered by these activities when incinerating hazardous waste. Data items and respondent activities associated with these requirements are covered in this ICR.

However, the burden for recordkeeping the applicable data items is covered in “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

- vi Records pertaining to the monitoring of existing instruments which relate to combustion and emission control every 15 minutes (§264.347(a));
- vii Records pertaining to the inspection of the complete incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.), at least daily, for leaks, spills, and fugitive emissions (§264.347(b)); and
  - Records pertaining to the inspection of all emergency shutdown controls and system alarms to assure proper operation (§264.347(b)).

(ii) Respondent activity:

Respondents must perform the following activity in gathering these data:

- viii Record all inspection data.

Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027

Under 40 CFR 265.352, these wastes may be burned in interim status hazardous waste incinerators if owner/operators receive a certification from the Assistant Administrator for Solid Waste and Emergency Response that they can meet the performance standards of Subpart O of Part 264.

(i) Data item:

The data item required to receive this certification include:

- An application to the Assistant Administrator containing the information in §§ 270.19 and 270.62.

(ii) Respondent activities:

Respondents must perform the following activities to receive this certification:

- Complete an application that demonstrates the incinerator can meet the performance standards in Subpart O of Part 264, including a trial burn; and
- Submit the application to EPA.

**Permitted facilities:**

Regulations



Each owner/operator regulated under 40 CFR Part 264, Subpart O is expected to read the regulations.

### Applicability

40 CFR Part 264, Subpart O presents permitted status hazardous waste incinerator standards. Section 264.340(b) exempts incinerator owner/operators from these regulations. Since the owner/operator submits applicability exemptions with the Part B Permit Application, data items and respondent activities associated with this requirement are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

### Notification of intent to burn hazardous wastes

40 CFR 264.343(a)(2) requires owner/operators to notify the Regional Administrator prior to burning EPA Hazardous Waste Codes F020, F021, F022, F023, F026, and F027.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with 40 CFR 264.343(a)(2), owners/operators must perform the following activities:

- Prepare notification of intent to burn wastes; and
- Submit notification to the Regional Administrator.

### Monitoring and inspections

40 CFR 264.347(a), (b) and (c) detail the monitoring and inspection requirements for Subpart O incinerators. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

Data items required to comply with these requirements include:

ix Records pertaining to the following monitoring activities (§264.347(a)):

- Combustion temperature, waste feed rate, and the indicator of combustion gas velocity specified in the facility permit must be monitored on a continuous basis;
- CO must be monitored on a continuous basis at a point in the incinerator downstream of the combustion zone and prior to release to the atmosphere; and

-- Upon request by the Regional Administrator, sampling and analysis of the waste and exhaust emissions must be conducted to verify that the operating requirements established in the permit achieve the performance standards of §264.343;

- Records pertaining to thorough visual inspections, conducted at least daily, of the incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.) for leaks, spills, fugitive emissions, and signs of tampering (§264.347(b)); and
- Records pertaining to operational testing, conducted at least weekly, of the emergency waste feed cutoff system and associated alarms to verify operability (§264.347(c));

OR

- A demonstration for exemption under §264.347(c) from the requirements to test the emergency waste feed cutoff system and associated alarms on a weekly basis; and
- Records pertaining to operational testing, conducted at least monthly, of the emergency waste feed cutoff system and associated alarms to verify operability (§264.347(c)).

(ii) Respondent activity:

Respondents must perform the following activity in order to be exempt from these requirements:

- Record all inspection data.

### **THERMAL TREATMENT UNITS (Interim Status Facilities Only)**

#### Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart P is expected to read the regulations.

#### Waste analysis

40 CFR 265.375 requires owner/operators of a thermal treatment unit to gather waste analysis data (in addition to that required in §265.13) for hazardous waste that has not been previously treated in his thermal treatment process to enable him to establish steady state (normal) or other appropriate (for non-continuous process) operating conditions (including auxiliary fuel feed) and to determine the type of pollutants which might be emitted. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571).

At a minimum, the analysis must determine:

- Heating value of the waste;
- Halogen content and sulfur content in the waste; and

- Concentrations in the waste of lead and mercury, unless the owner or operator has written, documented data that show that the element is not present.

(i) Data item:

The data item required to comply with these requirements include:

- Records of the waste analysis results.

(ii) Respondent activity:

Respondents must perform the following activity in gathering this data:

- Conduct waste analysis.

Monitoring and inspections

40 CFR 265.377 requires owner/operators of an interim status thermal treatment unit to conduct monitoring and inspection activities and collect the data gathered during these activities. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required for owners and operators of Subpart P incinerators include:

- Records pertaining to the monitoring, at least every 15 minutes, of existing instruments which relate to temperature and emission control (if an emission control device is present);
- Records pertaining to the visual observation, at least hourly, of the stack plume (emissions), where present, for normal appearance (color and capacity);
- Records pertaining to the inspection, at least daily, of the complete thermal process and associated equipment (pumps, valves, conveyors, pipes, etc.) for leaks, spills, and fugitive emissions; and
- Records pertaining to the inspection, at least daily, of all emergency shutdown controls and system alarms to assure proper operation.

(ii) Respondent activities:

Respondents must perform the following activities in gathering these data:

- Monitor existing instruments which relate to temperature and emission control (if an emission control device is present);

- Observe visually the stack plume, where present, for normal appearance;
- Inspect the complete thermal process and associated equipment for leaks, spills, and fugitive emissions; and
- Inspect all emergency shutdown controls and system alarms to assure proper operation.

Application to burn F020, F021, F023, F026, or F027

40 CFR 265.383(b)(1) requires owners/operators of facilities that thermally treat hazardous waste in devices other than enclosed devices using controlled flame combustion who chose to burn EPA Hazardous Wastes F020, F021, F022, F023, F026, or F027 to submit an application to burn these wastes. Applications to burn EPA Hazardous Wastes F020, F021, F022, F023, F026, or F027 must include the applicable information in §§ 270.19 and 270.62.

(i) Data item:

The data item required to comply with this requirement includes:

- An application to the Assistant Administrator for Solid Waste and Emergency Response containing information in §270.62 or §270.19(c).

(ii) Respondent activities:

To comply with §265.383(b)(1), respondents must perform the following activities:

- Collect information and prepare application; and
- Submit application to the Assistant Administrator for Solid Waste and Emergency Response.

**CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT UNITS (Interim Status Facilities Only)**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart Q is expected to read the regulations.

Waste analysis and trial tests

40 CFR 265.402 requires owner/operators of a chemical, physical, or biological treatment unit to conduct waste analyses (in addition to those required in §265.13) for hazardous waste, whenever:

- A hazardous waste which is substantially different from waste previously treated in a treatment process or equipment at the facility is to be treated in that process or equipment;

OR

- A substantially different process than any previously used at the facility is to be used to chemically treat hazardous waste.

Note that data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required for owners and operators of Subpart Q units include:

- Records of waste analyses and trial treatment tests (e.g., bench scale or pilot plant scale);

OR

- A demonstration that the proposed treatment will meet all applicable requirements of §265.401(a) and (b), based on written, documented information on similar treatment of similar waste under similar operating conditions.

(ii) Respondent activities:

Respondents must perform the following activities in gathering this data:

- Conduct waste analyses and trial treatment tests;

OR

- Obtain written, documented information on similar treatment of similar waste under similar operating conditions.

Inspections

40 CFR 265.403 requires owner/operators of a chemical, physical, or biological unit to conduct inspections of the unit, as specified below. Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the “General Hazardous Waste Facility Standards ICR” (EPA ICR Number 1571).

(i) Data items:

The data items required for owners and operators of Subpart Q treatment units include:

- Records pertaining to the inspection of discharge control and safety equipment (e.g., waste feed cutoff system, by-pass systems, drainage systems, and pressure relief systems), where present, at least once each operating day, to ensure that it is in good working order (§265.403(a)(1));

- Data gathered from monitoring equipment (e.g., pressure and temperature gauges), at least once each operating day, to ensure that the treatment process or equipment is being operating according to its design (§265.403(a)(2));
- Records pertaining to the inspection of construction materials of the treatment process or equipment, at least weekly, to detect corrosion or leaking fixtures or seams (§265.403(a)(3)); and
- Records pertaining to the inspection of construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation) (§265.403(a)(4)).

(ii) Respondent activities:

Respondents must perform the following activities in gathering these data:

- Inspect discharge control and safety equipment, where present, at least once each operating day, to ensure that it is in good working order (§265.403(a)(1));
- Gather data from monitoring equipment, where present, at least once each operating day, to ensure that the treatment process or equipment is being operating according to its design (§265.403(a)(2));
- Inspect construction materials of the treatment process or equipment, where present, at least weekly, to detect corrosion or leaking fixtures or seams (§265.403(a)(3)); and
- Inspect construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), where present, at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation) (§265.403(a)(4)).

## **DRIP PADS**

### **Generators:**

#### Regulations

Each respondent regulated under 40 CFR Part 261 is expected to read the regulations.

#### Equipment cleaning or replacement plan

40 CFR 261.35(b) requires owners and operators of facilities that generate wastes from wood preserving processes to either prepare, sign, and follow an equipment cleaning plan, or prepare, sign, and follow an equipment replacement plan. In addition, generators must document equipment cleaning and replacement in accordance with §261.35(b)(1)(iii). Generators must also maintain records documenting all equipment cleaning or replacement (§261.35(c)).

(i) Data item:

The data item required to comply with these requirements include:

- Documentation of equipment cleaning and replacement.

(ii) Respondent activities:

Respondents must perform the following activities in gathering this data:

- Prepare and follow an equipment cleaning plan;

OR

- Prepare and follow an equipment replacement plan;

OR

- Document cleaning and replacement; and
- Maintain documentation of equipment cleaning and replacement.

**Interim Status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart W is expected to read the regulations.

Contingency plan

40 CFR 265.440 requires owners and operators of facilities that use new or existing drip pads to convey treated wood drippage, precipitation, and/or surface water run-on to an associated collection system. The requirements are not applicable, however, to the management of infrequent and incidental drippage in storage yards provided that the owner or operator maintains and complies with a written contingency plan that describes how the owner or operator will respond immediately to the discharge of such infrequent and incidental drippage.

(i) Data item:

The data item required to comply with these requirements includes:

- Contingency plan describing how the owner or operator will do the following: (1) clean up the drippage; (2) document the cleanup of the drippage; (3) retain documents regarding cleanup for three years; and (4) manage the contaminated media in a manner consistent with Federal regulations (§265.440(c)).

(ii) Respondent activities:

To comply with §265.440(c), respondents must perform the following activities:

- Develop and maintain a contingency plan for discharge of drippage, including documentation of drippage.

Assessment of existing drip pad integrity

40 CFR 265.441(a) requires that for each existing drip pad as defined in §265.440, the owner or operator must evaluate the drip pad and determine that it meets all of the requirements of this Subpart, except the requirements for liners and leak detection systems of §265.443(b).

(i) Data item:

The data item for this evaluation includes:

- A written assessment of the drip pad, reviewed and certified by an independent, qualified registered professional engineer that attests to the results of the evaluation.

(ii) Respondent activities:

To comply with §265.441(a), respondents must perform the following activities:

- Obtain and submit a written, certified assessment of the drip pad;
- Maintain the written assessment of the drip pad; and
- Review, update, and re-certify the assessment annually.

Plan for upgrading, repairing, and modifying the drip pad

40 CFR 265.441(b) requires that the owner or operator develop a written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of §265.443(b) and must submit this plan no later than two years before the date that all repairs, upgrades, and modifications will be complete. This written plan must describe all changes to be made to the drip pad. Upon completion of all repairs and modifications, the owner or operator must submit the as-built drawing with certification by an independent, qualified engineer attesting that the drip pad conforms to the drawings, as specified in 40 CFR 265.441(c).

(i) Data items:

The data items for these requirements include:

- A written plan reviewed and certified by an independent qualified, registered professional engineer; and
- As-built drawings for the drip pad together with a certification by an independent, qualified registered professional engineer attesting that the drip pad conforms to the drawings.



(ii) Respondent activities:

To comply with §265.441(b)-(c), respondents must perform the following activities:

- Develop and submit to the Regional Administrator a written certified plan;
- Maintain a written assessment of the plan; and
- Obtain and submit as-built drawings and a certification.

Design and operating requirements

40 CFR 265.443 specifies design and operating requirements for owners and operators of facilities with drip pads. Sections 265.443(a), (b), (g), (i), and (k) include information collection requirements associated with the design, construction, operation, and maintenance of the drip pads.

(i) Data items:

The data items required to comply with these requirements include:

- A written assessment of the drip pad, reviewed and certified by an independent, qualified registered professional engineer that attests to the results of the evaluation. The assessment must be reviewed, updated, and recertified annually. The evaluation must document the extent to which the drip pad meets the design and operating standards of this section (§265.443(a)(4)(ii));
- Documentation in the unit's operating log of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner that is designed, constructed, maintained, and operated to collect leakage from the drip pad (§265.443(b)(3));
- Certification from an independent, qualified registered professional engineer stating that the drip pad design meets the requirements of §265.443 (§265.443(g));
- Documentation in the unit's operating log of the date and time of each weekly cleaning of the drip pad and the cleaning procedure used (§265.443(i)); and
- Records sufficient to document that all treated wood is held on the pad following treatment in accordance with this requirement (§265.443(k)).

(ii) Respondent activities:

To comply with §265.443(a), (b), (g), (i), and (k), respondents must perform the following activities:

- Obtain and maintain a written certified assessment of a new drip pad;

- Update and maintain the written certified assessment of the drip pad annually;
- Maintain documentation of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner;
- Obtain and maintain a certification from an independent, qualified registered professional engineer stating that the drip pad design meets the requirements of §265.443;
- Maintain documentation of the date and time of each weekly cleaning of the drip pad; and
- Maintain records that all treated wood is held on the drip pad after treatment.

#### Emergency response

40 CFR 265.443(m) requires that throughout the active life of the drip pad, the owner or operator must repair within a reasonably prompt period of time any condition detected that may have caused or has caused a release of hazardous waste.

##### (i) Data items:

The data items for this requirement include:

- A record of discovery of each condition in the unit operating log;
- A 24-hour notification;
- Written notification of the condition to the Regional Administrator within 10 working days of the discovery, providing a description of the steps that will be taken to repair the drip pad, and clean up any leakage, and the schedule for accomplishing this work; and
- Written notification with a certification by an independent, qualified, registered professional engineer to the Regional Administrator showing that all repairs and clean up have been completed according to the written plan submitted.

##### (ii) Respondent activities:

To comply with §265.443(m), respondents must perform the following activities:

- Enter a record of discovery for each condition;
- Notify EPA of each condition within 24 hours;
- Provide written notification to EPA within 10 working days; and
- Prepare and submit a report with certification to EPA when all repairs and clean up are complete.

#### Facility operating record

40 CFR 265.443(n) requires that the owner or operator of a unit with drip pads must maintain as part of the unit's operating log, documentation of past operating and waste handling practices.

(i) Data item:

The data item for this requirement is:

- Documentation of past operating and waste handling practices, which must include identification of preservative formulations used in the past, a description of drippage management practices, and a description of treated wood storage and handling practices.

(ii) Respondent activity:

To comply with §265.443(n), respondents must perform the following activity:

- Maintain documentation of past operating and waste handling practices.

Inspections

40 CFR 265.444 requires that during construction or installation, liners and cover systems (e.g., membranes sheets, or coatings) must be inspected for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials). Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571).

(i) Data items:

The data items for this requirement include:

- Inspection of liners immediately after construction or installation with certification by an independent qualified, registered professional engineer. Also, drip pads must be inspected weekly while in operation; and
- Certifications of inspection must be maintained at the unit as part of the unit's operating record.

(ii) Respondent activities:

To comply with §265.444 respondents must perform the following activity:

- Inspect and certify liners immediately after construction or installation; and
- Inspect and certify liners on a weekly basis.

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart W is expected to read the regulations.

#### Contingency plan

40 CFR 264.570 requires owners and operators of facilities that use new or existing drip pads to convey treated wood drippage, precipitation, and/or surface water run-on to an associated collection system. The requirements are not applicable, however, to the management of infrequent and incidental drippage in storage yards provided that the owner or operator maintains and complies with a written contingency plan that describes how the owner or operator will respond immediately to the discharge of such infrequent and incidental drippage.

(i) Data item:

The data item for this requirement includes:

- Contingency plan describing how the owner or operator will do the following: (1) clean up the drippage; (2) document the cleanup of the drippage; (3) retain documents regarding cleanup for three years; and (4) manage the contaminated media in a manner consistent with Federal regulations (§264.570(c)(1)).

(ii) Respondent activity:

To comply with §264.570(c)(1), respondents must perform the following activity:

- Develop and maintain a contingency plan for discharge of drippage, including documentation of drippage.

#### Assessment of existing drip pad integrity

40 CFR 264.571(a) requires that for each existing drip pad as defined in §264.570, the owner or operator must evaluate the drip pad and determine that it meets all of the requirements of this Subpart, except the requirements for liners and leak detection systems of §264.573(b).

(i) Data item:

The data item for this evaluation includes:

- A written assessment of the drip pad, reviewed and certified by an independent, qualified registered professional engineer that attests to the results of the evaluation.

(ii) Respondent activities:

To comply with §264.571(a), respondents must perform the following activities:

- Obtain a written, certified assessment of the drip pad;

- Maintain on file the written assessment of the drip pad; and
- Review, update, and re-certify the assessment annually.

Plan for upgrading, repairing, and modifying the drip pad

40 CFR 264.571(b) requires that the owner or operator develop a written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of §264.573(b) and must submit this plan no later than two years before the date that all repairs, upgrades, and modifications will be complete. This written plan must describe all changes to be made to the drip pad. Upon completion of all repairs and modifications, the owner or operator must submit the as-built drawing with certification by an independent, qualified engineer attesting that the drip pad conforms to the drawings, as specified in 40 CFR 264.571(c).

(i) Data items:

The data items for these requirements include:

- A written plan reviewed and certified by an independent qualified, registered professional engineer; and
- As-built drawings for the drip pad together with a certification by an independent, qualified registered professional engineer attesting that the drip pad conforms to the drawings.

(ii) Respondent activities:

To comply with §264.571(b)-(c), respondents must perform the following activities:

- Develop and submit to the Regional Administrator a written certified plan;
- Maintain a written assessment of the plan; and
- Obtain and submit as-built drawings and a certification.

Design and operating requirements

40 CFR 264.573 specifies design and operating requirements for owners and operators of facilities with drip pads. Sections 264.573(a), (b), (g), (i), and (k) include information collection requirements associated with the design, construction, operation, and maintenance of the drip pads.

(i) Data items:

The data items required to comply with these requirements include:

- A written assessment of the drip pad, reviewed and certified by an independent, qualified registered professional engineer that attests to the results of the evaluation. The assessment must be reviewed, updated, and recertified annually. The evaluation must

document the extent to which the drip pad meets the design and operating standards of this section (§264.573(a)(4)(ii));

- Documentation in the unit's operating log of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner that is designed, constructed, maintained, and operated to collect leakage from the drip pad (§264.573(b)(3));
- Certification from an independent, qualified registered professional engineer stating that the drip pad design meets the requirements of §264.573 (§264.573(g));
- Documentation in the unit's operating log of the date and time of each weekly cleaning of the drip pad and the cleaning procedure used (§264.573(i)); and
- Records sufficient to document that all treated wood is held on the pad following treatment in accordance with this requirement (§264.573(k)).

(ii) Respondent activities:

To comply with §264.573(a), (b), (g), (i), and (k), respondents must perform the following activities:

- Obtain and maintain a written certified assessment of a new drip pad;
- Update and maintain the written certified assessment of the drip pad annually;
- Maintain documentation of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner;
- Obtain and maintain a certification from an independent, qualified registered professional engineer stating that the drip pad design meets the requirements of §264.573;
- Maintain documentation of the date and time of each weekly cleaning of the drip pad; and
- Maintain records that all treated wood is held on the drip pad after treatment.

Emergency response

40 CFR 264.573(m) requires that throughout the active life of the drip pad, the owner or operator must repair within a reasonably prompt period of time any condition detected that may have caused or has caused a release of hazardous waste.

(i) Data items:

The data items for this requirement include:

- A record of discovery of each condition in the unit operating log;

- A 24-hour notification;
- Written notification of the condition to the Regional Administrator within 10 working days of the discovery, providing a description of the steps that will be taken to repair the drip pad, and clean up any leakage, and the schedule for accomplishing this work; and
- Written notification with a certification to the Regional Administrator showing that all repairs and clean up have been completed according to the written plan submitted.

(ii) Respondent activities:

To comply with §264.573(m), respondents must perform the following activities:

- Enter a record of discovery for each condition;
- Notify EPA of each condition within 24 hours;
- Provide written notification to EPA within 10 working days; and
- Prepare and submit a report with certification to EPA when all repairs and clean up are complete.

Facility operating record

40 CFR 264.573(n) requires that the owner or operator of a unit with drip pads must maintain as part of the unit's operating log, documentation of past operating and waste handling practices.

(i) Data item:

The data item for this requirement is:

- Documentation of past operating and waste handling practices, which must include identification of preservative formulations used in the past, a description of drippage management practices, and a description of treated wood storage and handling practices.

(ii) Respondent activity:

To comply with §264.573(n), respondents must perform the following activity:

- Maintain documentation of past operating and waste handling practices.

Inspections

40 CFR 264.574 requires that during construction or installation, liners and cover systems (e.g., membranes sheets, or coatings) must be inspected for uniformity, damage, and imperfections (e.g., holes, cracks, thin spots, or foreign materials). Data items and respondent activities associated with these requirements are covered in this ICR. However, the burden for recordkeeping the applicable data items is covered in the "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571).

(i) Data items:

The data items for this requirement include:

- Inspection of liners immediately after construction or installation with certification by an independent qualified, registered professional engineer. Also, drip pads must be inspected weekly while in operation; and
- Certifications of inspection must be maintained at the unit as part of the unit's operating record.

(ii) Respondent activities:

To comply with §264.574 respondents must perform the following activity:

- Inspect and certify liners immediately after construction or installation; and
- Inspect and certify liners on a weekly basis.

### **MISCELLANEOUS UNITS (Permitted Facilities Only)**

Because developing and following a written schedule for inspecting equipment is covered in the "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571), submitting a biennial report is covered in the "Biennial Report ICR" (EPA ICR Number 976), preparing an unmanifested waste report is covered in the "Manifest ICR" (EPA ICR Number 801), preparing release, fire, explosion, and closure reports are covered in the "General Hazardous Waste Facility Standards ICR" (EPA ICR Number 1571), and documenting post-closure care procedures for closed miscellaneous units that have contaminated soils or ground water are covered in the "Part B Permit Application, Permit Modification, and Special Permits ICR" (EPA ICR Number 1573), these data items and activities associated with them are not covered in this ICR. The only burden covered in this ICR for respondents regulated under 40 CFR Part 264, Subpart X is for reading the regulations.

### **PROCESS VENTS**

#### **Interim status facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart AA is expected to read the regulations.

Control device operation documentation

40 CFR 265.1033(i) requires owner/operators to prepare documentation describing the operation of control devices different from those specified in §265.1033(f), (g), and (h) and identifying process parameters that indicate proper operation and maintenance of those control devices.



(i) Data items:

The data items for this determination include:

- Information describing the control device operation; and
- Information on the process parameter or parameters that will be used to indicate proper operation and maintenance of the control device.

(ii) Respondent activities:

To comply with §265.1033(i), respondents must perform the following activities:

- Gather information on control device operation and process parameters;
- Document control device operation and process parameter information;
- Reassess and file control device/process parameter information;
- Modify control device documentation, if necessary; and
- Maintain documentation at the unit (required under §265.1035(e)).

Waste determination

40 CFR 265.1034(d)(2) requires owner/operators to document waste determinations that are based on knowledge of the waste rather than testing.

(i) Data items:

Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;
- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and
- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities:

To comply with §265.1034(d)(2), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;
- Document information on production processes, waste generation, and specification analysis; and
- Maintain documentation at the unit.

Facility operating record

Implementation schedule

Under 40 CFR 265.1035(b)(1), owner/operators of facilities that comply with the provisions of §265.1033(a)(2) are required to put the implementation schedule in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date.

(ii) Respondent activities:

To comply with §265.1035(b)(1), respondents must perform the following activities:

- Prepare implementation schedule;
- Reassess implementation schedule;
- File and maintain implementation schedule; and
- Modify implementation schedule, if necessary.

Up-to-date documentation of compliance with the process vent standards in §265.1032

Under 40 CFR 265.1035(b)(2), owner/operators are required to record the following information in the unit operating record to document up-to-date compliance with §265.1032.

(i) Data items:

The data items for this requirement include:

- Information and data identifying all affected process vents, annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and for the overall unit, and the approximate location within the unit of each affected unit; and

- Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests.

(ii) Respondent activities:

To comply with §265.1035(b)(2), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Performance test plan

Under 40 CFR 265.1035(b)(3), owner/operators are required to put the performance test plan in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- Where an owner or operator chooses to use test data to determine the organic removal efficiency or total organic compound concentration achieved by the control device, a performance test plan that includes the following information:
  - A description of how it is determined that the planned test is going to be conducted when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur. This shall include the estimated or design flow rate and organic content of each vent stream and define the acceptable operating ranges of key process and control device parameters during the test program;
  - A detailed engineering description of the closed-vent system and control device, including:
    - Manufacturer's name and model number of control device;
    - Type of control device;
    - Dimensions of the control device;
    - Capacity;
    - Construction materials; and

--

A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.

(ii) Respondent activities:

To comply with §265.1035(b)(3), respondents must perform the following activities:

- Prepare performance test plan;
- Reassess performance test plan;
- File and maintain performance test plan; and
- Modify performance test plan, if necessary.

Documentation of compliance with §265.1033

Under 40 CFR 265.1035(b)(4), owner/operators are required to record the following information in the unit operating record to document compliance with §265.1033.

(i) Data items:

The data items for this requirement include:

- A list of all information references and sources used in preparing the documentation;
- Records including the dates of each compliance test required by §265.1033(j);
- If engineering calculations are used, a design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on the appropriate sections of “APTI Course 415: Control of Gaseous Emissions” or other engineering texts acceptable to the Regional Administrator that present basic control device design information. Documentation provided by the control device manufacturer or vendor that describes the control device design in accordance with paragraphs (b)(4)(iii)(A) through (b)(4)(iii)(G) of this section may be used;
- A statement signed and dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur;
- A statement signed and dated by the owner/operator certifying that the control device is designed to operate at an efficiency of 95 percent or greater unless the total organic concentration limit of §265.1032(a) is achieved at an efficiency less than 95 percent or the total organic emission limits of §265.1032(a) for affected process vents at the unit can

be attained by a control device involving vapor recovery at an efficiency less than 95 weight percent. A statement provided by the control device manufacturer or vendor certifying that the control equipment meets the design specifications may be used to comply with this requirement; and

- If performance tests are used to demonstrate compliance, all tests results.

(ii) Respondent activities:

To comply with §265.1035(b)(4), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Design, monitoring, operation, and inspection information

Under 40 CFR 265.1035(c), owner/operators are required to record the following information in the unit operating record for each closed-vent system and control device required to comply with §265.1033.

(i) Data items:

The data items for this requirement include:

- Description and date of each modification that is made to the closed-vent system or control device design;
- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§ 265.1033(f)(1) and (f)(2);
- Monitoring, operating and inspection information required by paragraphs (f) through (k) of §265.1033;
- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;
- Explanation for each period recorded under paragraph (4) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;

- For a carbon adsorption system operated subject to requirements specified in §§ 265.1033(g) or 265.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;
- For a carbon adsorption system operated subject to requirements specified in §265.1033(h)(1), a log recording the following information:
  - Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and
  - Date existing carbon in control device is replaced with fresh carbon;
- Date of each control device start-up and shutdown;
- Where an owner or operator designates any components of a closed-vent system as unsafe to monitor pursuant to §265.1033(n), the owner or operator must record in a log that is kept in the facility operating record: the identification of closed-vent system components that are designated unsafe to monitor pursuant to §265.1033(n), an explanation for each closed-vent system component stating why the closed-vent system component is unsafe to monitor, and the plan for monitoring each closed-vent system component; and
- When each leak is detected as specified in §265.1033(k), record the following information:
  - The instrument identification number, the closed-vent system component identification number, and the operator name, initials, or identification number;
  - The date the leak was detected and the date of first attempt to repair the leak;
  - The date of successful repair of the leak;
  - Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonreparable; and
  - “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(ii) Respondent activities:

To comply with §265.1035(c), respondents must perform the following activities:

- Prepare design, monitoring, operation, and inspection information;
- Reassess design, monitoring, operation, and inspection information;
- File and maintain design, monitoring, operation, and inspection information; and

- Modify design, monitoring, operation, and inspection information, if necessary.

Determination of applicability of §265.1032

Under 40 CFR 265.1035(f), owner/operators are required to record the following information in the unit operating record used to determine the applicability of §265.1032 process vent standards.

(i) Data item:

The data item for this requirement includes:

- Up-to-date information and data used to determine whether or not a process vent is subject to the requirements in §265.1032 including supporting documentation as required by §265.1034(d)(2) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used.

(ii) Respondent activities:

To comply with §265.1035(f), respondents must perform the following activities:

- Prepare the determination of applicability;
- Reassess the determination of applicability;
- File and maintain the determination of applicability; and
- Modify the determination of applicability, if necessary.

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart AA is expected to read the regulations.

Control device operation documentation

40 CFR 264.1033(j) requires owner/operators to prepare documentation describing the operation of control devices different from those specified in §264.1033(f), (g), and (h) and identifying process parameters that indicate proper operation and maintenance of those control devices.

(i) Data items:

The data items for this determination include:

- Information describing the control device operation; and

- Information on the process parameter or parameters that will be used to indicate proper operation and maintenance of the control device.

(ii) Respondent activities:

To comply with §264.1033(j), respondents must perform the following activities:

- Gather information on control device operation and process parameters;
- Document control device operation and process parameter information;
- Reassess control device operation documentation;
- Modify control device operation documentation, if necessary; and
- Maintain documentation at the unit (required under §264.1035(e)).

Waste determination

40 CFR 264.1034(d)(2) requires owner/operators to document waste determinations that are based on knowledge of the waste rather than testing.

(i) Data items:

Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;
- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and
- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities:

To comply with §264.1034(d)(2), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;
- Document information on production processes, waste generation, and specification analysis; and
- Maintain documentation at the unit.



## Facility operating record

### Implementation schedule

Under 40 CFR 264.1035(b)(1), owner/operators of facilities that comply with the provisions of §264.1033(a)(2) are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date;

(ii) Respondent activities:

To comply with §264.1035(b)(1), respondents must perform the following activities:

- Prepare the implementation schedule;
- Reassess the implementation schedule;
- File and maintain the implementation schedule; and
- Modify the implementation schedule, if necessary.

### Up-to-date documentation of compliance with the process vent standards in §264.1032

Under 40 CFR 264.1035(b)(2), owner/operators are required to record the following information in the unit operating record to document up-to-date compliance with §264.1032.

(i) Data items:

The data items for this requirement include:

- Information and data identifying all affected process vents, annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and for the overall unit, and the approximate location within the unit of each affected unit; and
- Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests.

(ii) Respondent activities:

To comply with §264.1035(b)(2), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Performance test plan

Under 40 CFR 264.1035(b)(3), owners/operators that choose to use test data to determine the organic removal efficiency or total organic compound concentration achieved by the control device are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A performance test plan that includes the following information:
  - A description of how it is determined that the planned test is going to be conducted when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur. This shall include the estimated or design flow rate and organic content of each vent stream and define the acceptable operating ranges of key process and control device parameters during the test program;
  - A detailed engineering description of the closed-vent system and control device, including:
    - Manufacturer's name and model number of control device;
    - Type of control device;
    - Dimensions of the control device;
    - Capacity;
    - Construction materials; and
  - A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.

(ii) Respondent activities:

To comply with §264.1035(b)(3), respondents must perform the following activities:

- Prepare performance test plan;

- Reassess performance test plan;
- File and maintain performance test plan; and
- Modify performance test plan, if necessary.

Documentation of compliance with §264.1033

Under 40 CFR 264.1035(b)(4), owner/operators are required to record the following information in the unit operating record to document compliance with §264.1033.

(i) Data items:

The data items for this requirement include:

- A list of all information references and sources used in preparing the documentation;
- Records including the dates of each compliance test required by §264.1033(k);
- If engineering calculations are used, a design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on the appropriate sections of “APTI Course 415: Control of Gaseous Emissions” or other engineering texts acceptable to the Regional Administrator that present basic control device design information. Documentation provided by the control device manufacturer or vendor that describes the control device design in accordance with paragraphs (b)(4)(iii)(A) through (b)(4)(iii)(G) of this section may be used;
- A statement signed and dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur;
- A statement signed and dated by the owner/operator certifying that the control device is designed to operate at an efficiency of 95 percent or greater unless the total organic concentration limit of §264.1032(a) is achieved at an efficiency less than 95 percent or the total organic emission limits of §264.1032(a) for affected process vents at the unit can be attained by a control device involving vapor recovery at an efficiency less than 95 weight percent. A statement provided by the control device manufacturer or vendor certifying that the control equipment meets the design specifications may be used to comply with this requirement; and
- If performance tests are used to demonstrate compliance, all test results.

(ii) Respondent activities:

To comply with §264.1035(b)(4), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Design, monitoring, operation, and inspection information

Under 40 CFR 264.1035(c), owner/operators are required to record the following information in the unit operating record for each closed-vent system and control device required to comply with §264.1033.

(i) Data items:

Data items for this requirement include:

- Description and date of each modification that is made to the closed-vent system or control device design;
- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§ 264.1033(f)(1) and (f)(2);
- Monitoring, operating and inspection information required by paragraphs (f) through (k) of §264.1033;
- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;
- Explanation for each period recorded under paragraph (4) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;
- For a carbon adsorption system operated subject to requirements specified in §§ 264.1033(g) or 264.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;
- For a carbon adsorption system operated subject to requirements specified in §264.1033(h)(1), a log recording the following information:
  - Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and
  - Date existing carbon in control device is replaced with fresh carbon;
- Date of each control device startup and shutdown;

- Where an owner or operator designates any components of a closed-vent system as unsafe to monitor pursuant to §264.1033(o), the owner or operator must record in a log that is kept in the facility operating record: the identification of closed-vent system components that are designated unsafe to monitor pursuant to §265.1033(o), an explanation for each closed-vent system component stating why the closed-vent system component is unsafe to monitor, and the plan for monitoring each closed-vent system component; and
- When each leak is detected as specified in §264.1033(l), record the following information:

- The instrument identification number, the closed-vent system component identification number, and the operator name, initials, or identification number;
- The date the leak was detected and the date of first attempt to repair the leak;
- The date of successful repair of the leak;
- Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonreparable; and
- “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(ii) Respondent activities:

To comply with §264.1035(c), respondents must perform the following activities:

- Prepare design, monitoring, operation, and inspection information;
- Reassess design, monitoring, operation, and inspection information;
- File and maintain design, monitoring, operation, and inspection information; and
- Modify design, monitoring, operation, and inspection information, if necessary.

Determination of applicability of §264.1032

Under 40 CFR 264.1035(f), owner/operators are required to record the following information in the unit operating record used to determine the applicability of §264.1032 process vent standards.

(i) Data item:

The data item for this requirement includes:

- Up-to-date information and data used to determine whether or not a process vent is subject to the requirements in §264.1032 including supporting documentation as required

by §264.1034(d)(2) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used.

(ii) Respondent activities:

To comply with §264.1035(f), respondents must perform the following activities:

- Prepare determination of applicability;
- File and maintain determination of applicability;
- Reassess determination of applicability; and
- Modify determination of applicability, if necessary.

Semiannual report of control device monitoring events

40 CFR 264.1036 requires owner/operators with control devices that have exceeded or operated outside of the design specifications as defined in §264.1035(c)(4) for more than 24 hours or flares that have operated with visible emissions as defined in §264.1033(d) to submit a semiannual report to the Regional Administrator. The report must contain the following information:

- The EPA identification number, name, and address of the unit;
- Dates when the control device exceeded or operated outside of the design specifications as indicated by the control device monitoring required by §264.1033(f) which were not corrected within 24 hours;
- Dates when a flare operated with visible emissions as defined in §264.1033(d) and as determined by Method 22 monitoring;
- The duration and cause of each control device exceedance or visible emissions; and
- Corrective measures taken for each control device exceedance or visible emissions.

(i) Data item:

The data item for this requirement includes:

- A semiannual report.

(ii) Respondent activities:

To comply with §264.1036, respondents must perform the following activities:

- Prepare the semiannual report; and
- Submit the semiannual report to the Regional Administrator.

## **EQUIPMENT LEAKS**

### **Interim status facilities:**

#### Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart BB is expected to read the regulations.

#### Notification to implement the alternate valve standard specified in §265.1061(a)

40 CFR 265.1061(b)(1) requires owners or operators that have decided to implement the alternative standard for valves specified in §265.1061(a) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §265.1061(b)(1), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

#### Notification to discontinue implementing the alternative valve standard specified in §265.1061(a)

40 CFR 265.1061(d) requires owners or operators that no longer wish to implement the alternative standard for valves specified in §265.1061(a) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §265.1061(d), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

#### Notification to implement the alternative valve standard specified in §§ 265.1062(b)(2), or 265.1062(b)(3)

40 CFR 265.1062(a)(2) requires owners or operators that have decided to implement the alternative standard for valves specified in §§ 265.1062(b)(2), or 265.1062(b)(3) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §265.1062(a)(2), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

Non-hazardous waste documentation

40 CFR 265.1063(d)(3) requires owners or operators that determining that each piece of equipment does or does not contain hazardous waste with organic concentration that equals or exceeds 10 percent waste to document the determination if it was based on knowledge rather than testing.

(i) Data items:

Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;
- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and
- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities:

To comply with §265.1063(d)(3), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;
- Document information on production processes, waste generation, and specification analysis; and
- Maintain documentation at the unit.



### Facility operating record

#### Equipment record

Under 40 CFR 265.1064(b)(1), owner/operators are required to record the following information in the unit operating record for each piece of equipment to which Subpart BB applies.

(i) Data items:

Data items for this requirement include:

- Equipment identification number and hazardous waste management unit identification;
- Approximate locations within the unit;
- Type of equipment;
- Percent-by-weight total organics in the hazardous waste stream at the equipment;
- Hazardous waste state at the equipment; and
- Method of compliance with the standard.

(ii) Respondent activities:

To comply with §265.1064(b)(1), respondents must perform the following activities:

- Prepare equipment record;
- Reassess equipment record;
- File and maintain equipment record; and
- Modify equipment record, if necessary.

#### Implementation schedule

Under 40 CFR 265.1064(b)(2), owner/operators of facilities that comply with the provisions of §265.1033(a)(2) are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date.

(ii) Respondent activities:

To comply with §265.1064(b)(2), respondents must perform the following activities:

- Prepare implementation schedule;
- Reassess implementation schedule;
- File and maintain implementation schedule; and
- Modify implementation schedule, if necessary.

Performance test plan

Under 40 CFR 265.1064(b)(3), owner/operators that choose to use test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A performance test plan as specified in §265.1035(b)(3).

(ii) Respondent activities:

To comply with §265.1064(b)(3), respondents must perform the following activities:

- Prepare performance test plan;
- Reassess performance test plan;
- File and maintain performance test plan; and
- Modify performance test plan, if necessary.

Documentation of compliance with §265.1060

Under 40 CFR 265.1064(b)(4), owner/operators are required to record the following information in the unit operating record to document compliance with §265.1060.

(i) Data item:

The data item for this requirement includes:

- Detailed design documentation or performance test results specified in §265.1035(b)(4).

(ii) Respondent activities:

To comply with §265.1064(b)(4), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Leak inspection log

Under 40 CFR 265.1064(d), owner/operators are required to record the following information in the unit operating record when each leak is detected as specified in §§ 265.1052, 265.1053, 265.1057, and 265.1058.

(i) Data item:

The data item for this requirement includes:

- An inspection log that includes the following information:
  - Instrument and operator identification numbers and the equipment identification number;
  - The date evidence of a potential leak was found in accordance with §265.1058(a);
  - The date the leak was detected and the dates of each attempt to repair the leak;
  - Repair methods applied in each attempt to repair the leak;
  - “Above 10,000” if the maximum instrument reading measured by the methods specified in §265.1063(b) after each repair attempt is equal to or greater than 10,000 ppm;
  - “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;
  - Documentation supporting the delay of repair of a valve in compliance with §265.1059(c);
  - The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a hazardous waste management unit shutdown;

-- The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days; and

-- The date of successful repair of the leak.

(ii) Respondent activities:

To comply with §265.1064(d), respondents must perform the following activities:

- Prepare leak inspection log;
- Reassess leak inspection log;
- File and maintain leak inspection log; and
- Modify leak inspection log, if necessary.

Design, monitoring, operation, and inspection information

Under 40 CFR 265.1064(e), owner/operators are required to record the following information in the unit operating record for each closed-vent system and control device required to comply with §265.1060.

(i) Data items:

Data item for this requirement include:

- Description and date of each modification that is made to the closed-vent system or control device design;
- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§ 265.1033(f)(1) and (f)(2);
- Monitoring, operating and inspection information required by paragraphs (f) through (j) of §265.1033;
- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;
- Explanation for each period recorded under paragraph (3) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;
- For a carbon adsorption system operated subject to requirements specified in §§ 265.1033(g) or 265.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;

- For a carbon adsorption system operated subject to requirements specified in §265.1033(h)(1), a log recording the following information:

-- Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and

-- Date when existing carbon in the control device is replaced with fresh carbon; and

- Date of each control device startup and shutdown.

(ii) Respondent activities:

To comply with §265.1064(e), respondents must perform the following activities:

- Prepare design, monitoring, operation, and inspection information;
- Reassess design, monitoring, operation, and inspection information;
- File and maintain design, monitoring, operation, and inspection information; and
- Modify design, monitoring, operation, and inspection information, if necessary.

Monitoring and inspection information for other control devices

Under 40 CFR 265.1064(f), owner/operators are required to record the following information in the unit operating record for a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system.

(i) Data item:

The data item for this requirement includes:

- Monitoring and inspection information indicating proper operation and maintenance of the control device.

(ii) Respondent activities:

To comply with §265.1064(f), respondents must perform the following activities:

- Prepare monitoring and inspection information;
- Reassess monitoring and inspection information;
- File and maintain monitoring and inspection information; and
- Modify monitoring and inspection information, if necessary.

### Equipment log

Under 40 CFR 265.1064(g), owner/operators are required to record the following information in the unit operating record for all equipment subject to §§ 265.1052 through §265.1060.

(i) Data item:

The data item for this requirement includes:

- A log recording the following information:
  - A list of identification numbers (except welded fittings) for equipment subject to the standards of Subpart BB;
  - A list of identification numbers for equipment that the owner or operator elects to designate for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, under §§ 265.1052(e), 265.1053(i), and 265.1057(f);
  - Signed designation of this equipment as subject to the requirements of §§ 265.1052(e), 265.1053(i), and 265.1057(f) by the owner or operator;
  - A list of equipment identification numbers for pressure relief devices required to comply with §265.1054(a);
  - The dates of each compliance test required in §§ 265.1052(e), 265.1053(i), 265.1054, and 265.1057(f);
  - The background level measured during each compliance test;
  - The maximum instrument reading measured at the equipment during each compliance test;
  - A list of identification numbers for equipment in vacuum service; and
  - Identification, either by list or location (area or group) of equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year.

(ii) Respondent activities:

To comply with §265.1064(g), respondents must perform the following activities:

- Prepare equipment log;
- Reassess equipment log;
- File and maintain equipment log; and

- Modify equipment log, if necessary.

Valve log for all valves subject to §265.1057(g) and (h)

Under 40 CFR 265.1064(h), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A log for all valves subject to §265.1057(g) and (h) that includes the following information:
  - A list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve; and
  - A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.

(ii) Respondent activities:

To comply with §265.1064(h), respondents must perform the following activities:

- Prepare valve log;
- Reassess valve log;
- File and maintain valve log; and
- Modify valve log, if necessary.

Valve log for all valves subject to §265.1062

Under 40 CFR 265.1064(i), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- For all valves complying with §265.1062, a log containing the following information:
  - A schedule for monitoring; and

- The percent of valves found leaking during each monitoring period.  
                 (ii)     Respondent activities:

To comply with §265.1064(i), respondents must perform the following activities:

- Prepare valve log;
- Reassess valve log;
- File and maintain valve log; and
- Modify valve log, if necessary.

Criteria log

Under 40 CFR 265.1064(j), owner/operators are required to record the following information in the unit operating record.

- (i)     Data item:

The data item for this requirement includes:

- A criteria log containing the following information:

--                   Criteria required in §265.1052(d)(5)(ii) and §265.1053(e)(2) and an explanation of the design criteria; and

--                   Any changes to these criteria and the reasons for these changes.

- (ii)     Respondent activities:

To comply with §265.1064(j), respondents must perform the following activities:

- Prepare criteria log;
- Reassess criteria log;
- File and maintain criteria log; and
- Modify criteria log, if necessary.

Exemption log

Under 40 CFR 265.1064(k), owner/operators are required to record the following information in the unit operating record.

- (i)     Data item:



The data item for this requirement includes:

- An exemption log containing the following information:
  - An analysis determining the design capacity of the hazardous waste management unit;
  - A statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to the requirements in §§ 265.1052 through 265.1060 and an analysis determining whether these hazardous wastes are heavy liquids; and
  - An up-to-date analysis and the supporting information and data used to determine whether or not equipment is subject to the requirements in §§ 265.1052 through 265.1060. The record shall include supporting documentation as required by §265.1063(d)(3) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used.

(ii) Respondent activities:

To comply with §265.1064(k), respondents must perform the following activities:

- Prepare exemption log;
- Reassess exemption log;
- File and maintain exemption log; and
- Modify exemption log, if necessary.

**Permitted facilities:**

Regulations

Each owner/operator regulated under Part 264 is expected to read the regulations.

Notification to implement the alternate valve standard specified in §264.1061(a)

40 CFR 264.1061(b)(1) requires owners or operators that have decided to implement the alternative standard for valves specified in §264.1061(a) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §264.1061(b)(1), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

Notification to discontinue implementing the alternative valve standard specified in §264.1061(a)

40 CFR 264.1061(d) requires owners or operators that no longer wish to implement the alternative standard for valves specified in §264.1061(a) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §264.1061(d), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

Notification to implement the alternative valve standard specified in §§ 264.1062(b)(2), or §264.1062(b)(3)

40 CFR 264.1062(a)(2) requires owners or operators that have decided to implement the alternative standard for valves specified in §§ 264.1062(b)(2) or 264.1062(b)(3) to notify the Regional Administrator.

(i) Data items:

No specific data items are to be included in this notification.

(ii) Respondent activities:

To comply with §264.1062(a)(2), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

Non-hazardous waste documentation

40 CFR 264.1063(d)(3) requires owners or operators that determining that each piece of equipment does or does not contain hazardous waste with organic concentration that equals or exceeds 10 percent waste to document the determination if it was based on knowledge rather than testing.

(i) Data items:

Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;
- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and
- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities:

To comply with §264.1063(d)(3), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;
- Document information on production processes, waste generation, and specification analysis; and
- Maintain documentation at the unit.

Facility operating record

Equipment record

Under 40 CFR 264.1064(b)(1), owner/operators are required to record the following information in the unit operating record for each piece of equipment to which Subpart BB applies.

(i) Data items:

Data items for this requirement include:

- Equipment identification number and hazardous waste management unit identification;
- Approximate locations within the unit;
- Type of equipment;
- Percent-by-weight total organics in the hazardous waste stream at the equipment;
- Hazardous waste state at the equipment; and
- Method of compliance with the standard.

(ii) Respondent activities:

To comply with §264.1064(b)(1), respondents must perform the following activities:

- Prepare equipment record;
- Reassess equipment record;
- File and maintain equipment record; and
- Modify equipment record, if necessary.

Implementation schedule

Under 40 CFR 264.1064(b)(2), owner/operators of facilities that comply with the provisions of §264.1033(a)(2) are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- An implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date.

(ii) Respondent activities:

To comply with §264.1064(b)(2), respondents must perform the following activities:

- Prepare implementation schedule;
- Reassess implementation schedule;
- File and maintain implementation schedule; and
- Modify implementation schedule, if necessary.

Performance test plan

Under 40 CFR 264.1064(b)(3), owner/operators that choose to use test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A performance test plan as specified in §264.1035(b)(3).

(ii) Respondent activities:

To comply with §264.1064(b)(3), respondents must perform the following activities:

- Prepare performance test plan;
- Reassess performance test plan;
- File and maintain performance test plan; and
- Modify performance test plan, if necessary.

Documentation of compliance with §264.1060

Under 40 CFR 264.1064(b)(4), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- Documentation of compliance with §264.1060, including detailed design documentation or performance test results specified in §264.1035(b)(4).

(ii) Respondent activities:

To comply with §264.1064(b)(4), respondents must perform the following activities:

- Prepare documentation of compliance;
- Reassess documentation of compliance;
- File and maintain documentation of compliance; and
- Modify documentation of compliance, if necessary.

Leak inspection log

Under 40 CFR 264.1064(d), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- When each leak is detected as specified in §§ 264.1052, 264.1053, 264.1057, and 264.1058, an inspection log that includes the following information:
  - Instrument and operator identification numbers and the equipment identification number;
  - The date evidence of a potential leak was found in accordance with §264.1058(a);
  - The date the leak was detected and the dates of each attempt to repair the leak;
  - Repair methods applied in each attempt to repair the leak;
  - “Above 10,000” if the maximum instrument reading measured by the methods specified in §264.1063(b) after each repair attempt is equal to or greater than 10,000 ppm;
  - “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;
  - Documentation supporting the delay of repair of a valve in compliance with §264.1059(c);
  - The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a hazardous waste management unit shutdown;
  - The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days; and
  - The date of successful repair of the leak.

(ii) Respondent activities:

To comply with §264.1064(d), respondents must perform the following activities:

- Prepare leak inspection log;
- Reassess leak inspection log;
- File and maintain leak inspection log; and
- Modify leak inspection log, if necessary.

Design, monitoring, operation, and inspection information

Under 40 CFR 264.1064(e), owner/operators are required to record the following information in the unit operating record for each closed-vent system and control device required to comply with §264.1060.

(i) Data items:

Data items for this requirement include:

- Description and date of each modification that is made to the closed-vent system or control device design;
- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§ 264.1033(f)(1) and (f)(2);
- Monitoring, operating and inspection information required by paragraphs (f) through (k) of §264.1033;
- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;
- Explanation for each period recorded under paragraph (4) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;
- For a carbon adsorption system operated subject to requirements specified in §§ 264.1033(g) or 264.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;
- For a carbon adsorption system operated subject to requirements specified in §264.1033(h)(1), a log recording the following information:
  - Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and
  - Date when existing carbon in the control device is replaced with fresh carbon; and
- Date of each control device startup and shutdown.

(ii) Respondent activities:

To comply with §264.1064(e), respondents must perform the following activities:

- Prepare design, monitoring, operation, and inspection information;
- Reassess design, monitoring, operation, and inspection information;

- File and maintain design, monitoring, operation, and inspection information; and
- Modify design, monitoring, operation, and inspection information, if necessary.

Monitoring and inspection information for other control devices

Under 40 CFR 264.1064(f), owner/operators are required to record the following information in the unit operating record for a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system.

(i) Data items:

Data items for this requirement include:

- Recordkeeping information specified by the Regional Administrator.

(ii) Respondent activities:

To comply with §264.1064(f), respondents must perform the following activities:

- Prepare monitoring and inspection information;
- Reassess monitoring and inspection information;
- File and maintain monitoring and inspection information; and
- Modify monitoring and inspection information, if necessary.

Equipment log

Under 40 CFR 264.1064(g), owner/operators are required to record the following information in the unit operating record.

(i) Data items:

Data items for this requirement include:

- A log recording the following information for all equipment subject to §§ 264.1052 through 264.1060:
  - A list of identification numbers (except welded fittings) for equipment subject to the standards of Subpart BB;
  - A list of identification numbers for equipment that the owner or operator elects to designate for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, under §§ 264.1052(e), 264.1053(i), and 264.1057(f);



- Signed designation of this equipment as subject to the requirements of §§ 264.1052(e), 264.1053(i), and 264.1057(f) by the owner or operator;
- A list of equipment identification numbers for pressure relief devices required to comply with §264.1054(a);
- The dates of each compliance test required in §§ 264.1052(e), 264.1053(i), 264.1054, and 264.1057(f);
- The background level measured during each compliance test;
- The maximum instrument reading measured at the equipment during each compliance test;
- A list of identification numbers for equipment in vacuum service; and
- Identification either by list or location (area or group) of equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year.

(ii) Respondent activities:

To comply with §264.1064(g), respondents must perform the following activities:

- Prepare equipment log;
- Reassess equipment log;
- File and maintain equipment log; and
- Modify equipment log, if necessary.

Valve log for all valves subject to §264.1057(g) and (h)

Under 40 CFR 264.1064(h), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A log for valves subject to §264.1057(g) and (h), including the following:
  - List of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve; and

-- List of identification numbers for valves designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.

(ii) Respondent activities:

To comply with §264.1064(h), respondents must perform the following activities:

- Prepare valve log;
- Reassess valve log;
- File and maintain valve log; and
- Modify valve log, if necessary.

Valve log for all valves subject to §264.1062

Under 40 CFR 264.1064(i), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- For all valves complying with §264.1062, a log containing the following information:

-- A schedule for monitoring; and

-- The percent of valves found leaking during each monitoring period.

(ii) Respondent activities:

To comply with §264.1064(i), respondents must perform the following activities:

- Prepare valve log;
- Reassess valve log;
- File and maintain valve log; and
- Modify valve log, if necessary.

Criteria log

Under 40 CFR 264.1064(j), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- A criteria log containing the following information:
  - Criteria required in §§ 264.1052(d)(5)(ii) and 264.1053(e)(2) and an explanation of the design criteria; and
  - Any changes to these criteria and the reasons for these changes.

(ii) Respondent activities:

To comply with §264.1064(j), respondents must perform the following activities:

- Prepare criteria log;
- Reassess criteria log;
- File and maintain criteria log; and
- Modify criteria log, if necessary.

Exemption log

Under 40 CFR 264.1064(k), owner/operators are required to record the following information in the unit operating record.

(i) Data item:

The data item for this requirement includes:

- An exemption log containing the following information:
  - An analysis determining design capacity of the hazardous waste management unit;
  - A statement listing hazardous waste influent to and effluent from each hazardous waste management unit subject to §§ 264.1052 through 264.1060 and an analysis determining whether these hazardous wastes are heavy liquids; and
  - An up-to-date analysis and the supporting information and data used to determine whether or not equipment is subject to the requirements in §§ 264.1052 through 264.1060. The record shall include supporting documentation as required by §264.1063(d)(3) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used.

(ii) Respondent activities:

To comply with §264.1064(k), respondents must perform the following activities:

- Prepare exemption log;
- Reassess exemption log;
- File and maintain exemption log; and
- Modify exemption log, if necessary.

Semiannual report of control device monitoring events

40 CFR 264.1065 requires owner/operators with control devices that have exceeded or operated outside of the design specifications as defined in §264.1035(c)(4) for more than 24 hours or flares that have operated with visible emissions as defined in §264.1033(d) to submit a semiannual report to the Regional Administrator. The report must contain the following information:

- The EPA identification number, name, and address of the unit;
- For each month during the semiannual reporting period:
  - The equipment identification number of each valve for which a leak was not repaired as required in §264.1057(d);
  - The equipment identification number of each pump for which a leak was not repaired as required in §§ 264.1052(c) and (d)(6); and
  - The equipment identification number of each compressor for which a leak was not repaired as required in §264.1053(g);
- Dates of hazardous waste management unit shutdowns that occurred within the semiannual reporting period; and
- For each month during the semiannual reporting period, dates when the control device installed as required by §§ 264.1052, 264.1053, 264.1054, or 264.1055 exceeded or operated outside the design specifications and was not corrected within 24 hours, the duration and cause of each exceedance, and any corrective measures taken.

(i) Data item:

The data item for this requirement includes:

- A semiannual report

(ii) Respondent activities:

To comply with §264.1065, respondents must perform the following activities:

- Prepare the semiannual report; and
- Submit the semiannual report to the Regional Administrator.

## CONTAINMENT BUILDINGS

### Interim status facilities:

#### Regulations

Each owner/operator regulated under 40 CFR Part 265, Subpart DD is expected to read the regulations.

#### Demonstration that unit meets the standards of Subpart DD

Under §265.1101(b)(4), for existing units other than 90-day generator units, EPA may delay the secondary containment requirement for up to two years, based on a demonstration by the owner/operator that the unit substantially meets the standards of this Subpart. In making a demonstration, the owner/operator must meet the requirements of §265.1101(b)(4)(i) and (ii).

#### (i) Data item:

The data item for this requirement includes:

- A demonstration that the unit substantially meets the standards of Subpart DD, if the owner/operator wants the secondary containment requirement to be delayed. The demonstration must include:
  - Written notice of the request, describing the unit and its operating practices with specific reference to the performance of existing containment systems and specific plans for retrofitting the unit with secondary containment;
  - Response to comments from the Regional Administrator; and
  - Fulfillment of the terms of the revised plan, if such plans are approved by EPA.

#### (ii) Respondent activity:

To comply with §265.1101(b)(4), respondents must perform the following activity:

- Demonstrate that the unit substantially meets the standards of Subpart DD, if the owner/operator wants the secondary containment requirement to be delayed, as required by or §265.1101(b)(4).

#### Certification and response procedures

Pursuant to §265.1101(c)(2), owner/operators of all containment units placed into operation prior to the effective date of the rule must obtain and maintain in the operating record (on-site files for

generators who are not formally required to have operating records) a certification by a qualified registered professional engineer. The certification must certify that the containment building design meets the requirements of §265.1101(a) through (c). Throughout the active life of the containment building, if the owner/operator detects a condition that could lead to or has caused a release of hazardous waste, s/he must repair the condition promptly, in accordance with the procedures in §265.1101(c)(3). The owner/operator must also inspect and record in the unit operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment as well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste, as required by §265.1101(c)(4).

(i) Data items:

Data items for this requirement include:

- Certification by a qualified registered professional engineer that the containment building design meets the requirements of §265.1101(a) through (c);
- Upon the owner/operator's detecting a condition that has caused a release:
  - A record of discovery of the release into the unit operating record;
  - A schedule for accomplishing cleanup and repairs;
  - Notification to the Regional Administrator of the condition within 7 days after the discovery of the condition;
  - A written notice with a description of the steps taken to repair the containment building, and a schedule for accomplishing the work; and
  - Notification to the Regional Administrator in writing and a verification signed by a qualified, registered professional engineer that the repairs and cleanup have been completed according to the written plan submitted in accordance with paragraph (c)(3)(i)(D) of this section;
- Data from monitoring and leak detection equipment, the containment building, and the area immediately surrounding the containment building.

(ii) Respondent activities:

To comply with §265.1101(c), respondents must perform the following activities:

- Obtain a certification by a qualified registered professional engineer and place this certification in the unit's operating record, as required by §265.1101(c)(2);
- Upon detecting a condition that has caused a release, the owner/operator must perform the following activities, as required by §265.1101(c)(3)(i):

- Enter a record of discovery of the release into the unit's operating record, as required by §265.1101(c)(3)(i)(A);
  - Establish a schedule for accomplishing cleanup and repairs, as required by §265.1101(c)(3)(i)(C);
  - Notify the Regional Administrator of the condition within 7 days after the discovery of the condition, as required by §265.1101(c)(3)(i)(D);
  - Provide to EPA within 14 days a written notice with a description of the steps taken to repair the containment building, and a schedule for accomplishing the work, as required by §265.1101(c)(3)(i)(D); and
  - Upon completing all repairs and cleanup, notify the Regional Administrator in writing and provide a verification signed by a qualified, registered professional engineer that the repairs and cleanup have been completed according to the written plan submitted in accordance with paragraph (c)(3)(i)(D) of this section, as required by §265.1101(c)(3)(i)(D)(iii);
- Inspect and record in the unit's operating record, at least once every seven days, data from monitoring and leak detection equipment, the containment building, and the area immediately surrounding the containment building, as required by §265.1101(c)(4).

#### Operating procedures for areas without secondary containment

Under 40 CFR 265.1101(d)(3), owners/operators of containment buildings that contain areas with and without secondary containment must maintain in the unit's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment.

(i) Data item:

The data item for this requirement includes:

- A written description of the operating procedures used to maintain the integrity of areas without secondary containment.

(ii) Respondent activity:

To comply with §265.1101(d)(3), respondents must perform the following activity:

- Maintain in the unit's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment, as required by §265.1101(d)(3).

#### Demonstration for exemption from secondary containment requirements

Under 40 CFR 265.1101(e), the owner/operator of a permitted containment building may obtain a waiver from secondary containment from EPA. In order to obtain this waiver, the owner/operator has to

demonstrate that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements, or that containment of managed wastes and liquids can be assured without a secondary containment system.

(i) Data item:

The data item for this requirement includes:

- A demonstration that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements and that containment of managed wastes and liquids can be assured without a secondary containment system, if applicable.

(ii) Respondent activity:

To comply with §265.1101(e), respondents must perform the following activity:

- Demonstrate that only free liquids in the unit are limited amounts of dust suppression liquids and that containment of managed wastes and liquids can be assured without a containment system, if the owner/operator wants EPA to waive secondary containment requirements for a permitted containment building, as provided by §265.1101(e).

**Permitted facilities:**

Regulations

Each owner/operator regulated under 40 CFR Part 264, Subpart DD is expected to read the regulations.

Demonstration that unit meets the standards of Subpart DD

Under §264.1101(b)(4), for existing units other than 90-day generator units, EPA may delay the secondary containment requirement for up to two years, based on a demonstration by the owner/operator that the unit substantially meets the standards of this Subpart. In making a demonstration, the owner/operator must meet the requirements of §264.1101(b)(4)(i) and (ii).

(i) Data item:

The data item for this requirement includes:

- A demonstration that the unit substantially meets the standards of Subpart DD, if the owner/operator wants the secondary containment requirement to be delayed. The demonstration must include:

-- Written notice of the request, describing the unit and its operating practices with specific reference to the performance of existing containment systems and specific plans for retrofitting the unit with secondary containment;



- Response to comments from the Regional Administrator; and
- Fulfillment of the terms of the revised plan, if such plans are approved by EPA.

(ii) Respondent activity:

To comply with §264.1101(b)(4), respondents must perform the following activity:

- Demonstrate that the unit substantially meets the standards of Subpart DD, if the owner/operator wants the secondary containment requirement to be delayed, as required by or §264.1101(b)(4).

Certification and response procedures

Pursuant to §264.1101(c)(2), owner/operators of all containment units placed into operation prior to the effective date of the rule must obtain and maintain in the operating record (on-site files for generators who are not formally required to have operating records) a certification by a qualified registered professional engineer. The certification must certify that the containment building design meets the requirements of §§264.1101(a) through (c). Throughout the active life of the containment building, if the owner/operator detects a condition that could lead to or has caused a release of hazardous waste, s/he must repair the condition promptly, in accordance with the procedures in §264.1101(c)(3). The owner/operator must also inspect and record in the unit operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment as well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste, as required by §264.1101(c)(4).

(i) Data items:

Data items for this requirement include:

- Certification by a qualified registered professional engineer that the containment building design meets the requirements of §264.1101(a) through (c);
- Upon the owner/operator's detecting a condition that has caused a release:
  - A record of discovery of the release into the unit operating record;
  - A schedule for accomplishing cleanup and repairs;
  - Notification to the Regional Administrator of the condition within 7 days after the discovery of the condition;
  - A written notice with a description of the steps taken to repair the containment building, and a schedule for accomplishing the work; and
  - Notification to the Regional Administrator in writing and a verification signed by a qualified, registered professional engineer that the repairs and cleanup have

been completed according to the written plan submitted in accordance with paragraph (c)(3)(i)(D) of this section; and

- Data from monitoring and leak detection equipment, the containment building, and the area immediately surrounding the containment building.

(ii) Respondent activities:

To comply with §264.1101(c), respondents must perform the following activities:

- Obtain a certification by a qualified registered professional engineer and place this certification in the unit's operating record, as required by §264.1101(c)(2);
- Upon detecting a condition that has caused a release, the owner/operator must perform the following activities, as required by §264.1101(c)(3)(i):
  - Enter a record of discovery of the release into the unit's operating record, as required by §264.1101(c)(3)(i)(A);
  - Establish a schedule for accomplishing cleanup and repairs, as required by §264.1101(c)(3)(i)(C);
  - Notify the Regional Administrator of the condition within 7 days after the discovery of the condition, as required by §264.1101(c)(3)(i)(D);
  - Provide to EPA within 14 days a written notice with a description of the steps taken to repair the containment building, and a schedule for accomplishing the work, as required by §264.1101(c)(3)(i)(D); and
  - Upon completing all repairs and cleanup, notify the Regional Administrator in writing and provide a verification signed by a qualified, registered professional engineer that the repairs and cleanup have been completed according to the written plan submitted in accordance with paragraph (c)(3)(i)(D) of this section, as required by §264.1101(c)(3)(i)(D)(iii); and
- Inspect and record in the unit's operating record, at least once every seven days, data from monitoring and leak detection equipment, the containment building, and the area immediately surrounding the containment building, as required by §264.1101(c)(4).

Operating procedures for areas without secondary containment

Under 40 CFR 264.1101(d)(3), owners/operators of containment buildings that contain areas with and without secondary containment must maintain in the unit's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment.

(i) Data item:

The data item for this requirement includes:

- A written description of the operating procedures used to maintain the integrity of areas without secondary containment.

(ii) Respondent activity:

To comply with §264.1101(d)(3), respondents must perform the following activities:

- Maintain in the unit's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment, as required by §264.1101(d)(3).

#### Demonstration for exemption from secondary containment requirements

Under 40 CFR 264.1101(e), the owner/operator of a permitted containment building may obtain a waiver from secondary containment from EPA. In order to obtain this waiver, the owner/operator has to demonstrate that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements, or that containment of managed wastes and liquids can be assured without a secondary containment system.

(i) Data item:

The data item for this requirement includes:

- A demonstration that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements and that containment of managed wastes and liquids can be assured without a secondary containment system, if applicable.

(ii) Respondent activity:

To comply with §264.1101(e), respondents must perform the following activity:

- Demonstrate that only free liquids in the unit are limited amounts of dust suppression liquids and that containment of managed wastes and liquids can be assured without a containment system, if the owner/operator wants EPA to waive secondary containment requirements for a permitted containment building, as provided by §264.1101(e).

## **SPECIFIC HAZARDOUS WASTE RECOVERY/RECYCLING FACILITIES**

### Regulations

Each owner/operator regulated under 40 CFR Part 266 is expected to read the regulations.

### Recyclable materials utilized for precious metal recovery

40 CFR 266.70(c) requires those who store recycled materials regulated under 40 CFR Part 266, Subpart F to keep records showing that they are not accumulating the materials speculatively (as defined in 261.1(c)).

(i) Data items:

The data items for this recordkeeping requirement are:

- Information showing the volume of recycled materials regulated under 40 CFR Part 266, Subpart F that are stored at the beginning of the calendar year;
- The amount of materials regulated under 40 CFR Part 266, Subpart F that are generated or received during the calendar year; and
- The amount of materials regulated under 40 CFR Part 266, Subpart F that are remaining at the end of the calendar year.

(ii) Respondent activities:

Respondents must perform the following activities to comply with this requirement:

- Record the information specified in 40 CFR 266.70(c); and
- File and maintain the information.

## **5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

The following subsections discuss how EPA (and authorized States in lieu of EPA) will collect information, what activities EPA (and authorized States in lieu of EPA) will perform once the information has been received, and how EPA will manage the information it collects. The subsections also include a discussion of how information collection requirements affect small entities.

### **5(a) AGENCY ACTIVITIES**

“Agency” in this section means EPA and the authorized States in lieu of EPA. The agency activities associated with respondent reporting are discussed below. This analysis assumes that there are no agency activities associated with recordkeeping activities (i.e., filing and maintaining documentation at the respondent’s unit) because documentation is not formally submitted to the agency. Although EPA will examine unit records during periodic inspections as activities that are a part of EPA’s overall compliance and enforcement program, the cost associated with these activities is not attributed to the Subparts covered in this ICR. In addition, review of items submitted with Part B permit applications are covered in the “Part B Permit Application, Permit Modification, and Special Permits ICR” (EPA ICR Number 1573).

## **TANK SYSTEMS**

### **Interim status facilities:**

Agency activities associated with requirements for owners and operators of interim status tank systems include the following:

- Reviewing equivalent containment device information;
- Reviewing information submitted for exemption from the 24-hour leak detection requirement;
- Reviewing information submitted for variance from secondary containment requirements;
- Reviewing information submitted for exemption from 24-hour waste removal requirement;
- Reviewing release notifications and reports;
- Reviewing major repair certifications; and
- Reviewing decontamination demonstrations.

### **Permitted facilities:**

Agency activities associated with requirements for owners and operators of permitted tank systems include the following:

- Reviewing information submitted for exemption from 24-hour waste removal requirement;
- Reviewing release notifications and reports;
- Reviewing major repair certifications; and
- Reviewing decontamination demonstrations.

## **SURFACE IMPOUNDMENTS**

### **Interim status facilities:**

Agency activities associated with requirements for owners and operators of interim status surface impoundments include the following:

- Reviewing assessments of alternate design and operating practices and notifications of intent to receive waste;
- Reviewing notifications of intent to receive wastes;

- Reviewing and establishing action leakage rates;
- Reviewing Response Action Plans;
- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports;
- Entering RAP data into a data base;
- Reviewing and establishing pump operating levels;
- Reviewing contingent corrective measures plans;
- Reviewing hazardous waste removal plans;
- Reviewing extension requests; and
- Reviewing corrective action reports.

**Permitted facilities:**

Agency activities associated with requirements for owners and operators of permitted surface impoundments include the following:

- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports;
- Entering RAP data into a data base;
- Reviewing notifications of surface impoundment removal from service.
- Reviewing contingent corrective measures plans;
- Reviewing hazardous waste removal plans;
- Reviewing extension requests; and
- Reviewing corrective action reports.

**WASTE PILES**

**Interim status facilities:**

Agency activities associated with requirements for owners and operators of interim status waste piles include the following:

- Reviewing exemptions from design and operating requirements;
- Reviewing and establishing action leakage rates;
- Reviewing Response Action Plans;
- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports; and
- Entering RAP data into a data base.

**Permitted facilities:**

Agency activities associated with requirements for owners and operators of permitted waste piles include the following:

- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports; and
- Entering RAP data into a data base.

**LAND TREATMENT**

**Interim status facilities:**

Agency activities associated with the requirements for interim status land treatment facilities include:

- Reviewing food-chain crop notifications; and
- Reviewing certifications of closure.

**Permitted facilities:**

Agency activities associated with the requirements for permitted land treatment facilities include the following:

- Reviewing notifications of significant increases of hazardous constituents below the treatment zone;
- Reviewing notifications of intent to demonstrate that regulated unit is not the source of increase in hazardous constituents below the treatment zone;
- Reviewing demonstrations that regulated unit is not the source of increase in hazardous constituents below the treatment zone;

- Reviewing §264.280(d) demonstrations; and
- Reviewing closure certifications.

## **LANDFILLS**

### **Interim status facilities:**

Agency activities associated with the requirements for interim status land treatment facilities include the following:

- Reviewing notifications of intent to receive waste;
- Reviewing demonstrations for exemption from the liner and leachate collection system requirements;
- Reviewing information for waivers of the double liner requirements;
- Reviewing and establishing action leakage rates;
- Reviewing Response Action Plans;
- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports;
- Entering RAP data into a data base;
- Reviewing and establishing pump operating levels; and
- Reviewing demonstrations for placing non-hazardous liquid waste in landfills (265.314(e)).

### **Permitted facilities:**

Agency activities associated with the requirements for permitted land treatment facilities include the following:

- Reviewing written action leakage rate exceedance notifications;
- Reviewing leakage reports;
- Entering RAP data into a data base; and
- Reviewing demonstrations for placing non-hazardous liquid waste in landfills (§264.314(e)).



## **INCINERATORS**

### **Interim status facilities:**

Agency activities associated with the requirements for interim status incinerators consist of reviewing applications for certification to burn hazardous wastes F020, F021, F022, F023, F026 and F027.

### **Permitted facilities:**

Agency activities associated with the requirements for permitted incinerators consist of reviewing notifications of intent to burn hazardous wastes F020, F021, F022, F023, F026 and F027, and reviewing demonstrations for exemption from emergency waste feed cutoff system testing requirements.

## **THERMAL TREATMENT UNITS**

### **Interim status facilities:**

Agency activities associated with 40 CFR Part 265, Subpart P include reviewing applications to burn hazardous wastes F020, F021, F022, F023, F026 and F027.

## **DRIP PADS**

### **Interim status facilities:**

Agency activities associated with 40 CFR Part 265, Subpart W include:

- Reviewing plans for updating, repairing, and modifying the drip pad; and
- Reviewing release notifications and reports.

### **Permitted facilities:**

Agency activities associated with 40 CFR Part 264, Subpart W include:

- Reviewing plans for updating, repairing, and modifying the drip pad; and
- Reviewing release notifications and reports.

## **PROCESS VENTS**

### **Permitted facilities:**

Agency activities associated with the requirements for permitted facilities with process vents include reviewing semiannual reports.

## **EQUIPMENT LEAKS**

**Interim status facilities:**

Agency activities associated with the requirements for interim status facilities with equipment subject to Subpart BB include:

- Reviewing notifications to implement the alternate valve standard specified in §265.1061(a);
- Reviewing notifications to discontinue implementing the alternate valve specified in §265.1061(a); and
- Reviewing notifications to implement the alternate valve standard specified in §§ 265.1062(b)(2) or (b)(3).

**Permitted facilities:**

Agency activities associated with the requirements for permitted facilities with equipment subject to Subpart BB include:

- Reviewing notifications to implement the alternate valve standard specified in §264.1061(a);
- Reviewing notifications to discontinue implementing the alternate valve specified in §264.1061(a);
- Reviewing notifications to implement the alternate valve standard specified in §§ 264.1062(b)(2) or (b)(3); and
- Reviewing semiannual reports.

**CONTAINMENT BUILDINGS****Interim status facilities:**

Agency activities associated with the requirements for interim status facilities with containment buildings subject to Subpart DD include:

- Collecting written notices of requests for delay of secondary containment;
- Reviewing and commenting on plans to retrofit a unit;
- Reviewing responses to comments and approving/disapproving a delay;
- Receiving notifications of release;
- Reviewing written notices, descriptions, or remedial steps, and schedules for cleanup;
- Reviewing information and determining if a unit must be removed from service;

- Notifying owner/operator in writing of determination;
- Reviewing verification of cleanup; and
- Reviewing no-free-liquid demonstrations.

**Permitted facilities:**

Agency activities associated with the requirements for permitted facilities with containment buildings subject to Subpart DD include:

- Collecting written notices of requests for delay of secondary containment;
- Reviewing and commenting on plans to retrofit a unit;
- Reviewing responses to comments and approving/disapproving a delay;
- Receiving notifications of release;
- Reviewing written notices, descriptions, or remedial steps, and schedules for cleanup;
- Reviewing information and determining if a unit must be removed from service;
- Notifying owner/operator in writing of determination;
- Reviewing verification of cleanup; and
- Reviewing no-free-liquid demonstrations.

**5(b) COLLECTION METHODOLOGY AND MANAGEMENT**

Respondents are required to submit certain documentation to the agency as discussed in Section 6. The submitted documents are maintained by the receiving agency. The agency enters select data about the respondents' facilities and the submitted documents into RCRAInfo; RCRAInfo is EPA's comprehensive information system which provides access to data supporting the implementation and management of the RCRA hazardous waste program.

**5(c) SMALL ENTITY FLEXIBILITY**

EPA does not anticipate that many small businesses will be engaging in the types of activities covered in this ICR. However, to the extent that there are small entities with, for example, a regulated hazardous waste tank system, they are subject to the same standards as larger entities. EPA has been directed by Congress to promulgate standards to protect public health and the environment. In cases where small businesses engage in activities that endanger the environment, EPA believes it is alleviating its responsibility to respond to its Congressional mandate by exempting them from regulation.

## **5(d) COLLECTION SCHEDULE**

### **TANK SYSTEMS**

#### **Interim status facilities:**

Facilities must submit release notification reports within 30 days of detecting a release. In addition, the certification of major repairs (required under §265.196(f)) must be submitted within 7 days of returning the repaired tank system to use.

#### **Permitted facilities:**

Release notification reports must be submitted within 24 hours of detection, and certification of major repairs must be submitted within 7 days after returning the repaired tank system to use.

### **SURFACE IMPOUNDMENTS**

#### **Interim status facilities:**

Notification of intent to receive waste must be submitted 60 days prior to receiving waste. Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

#### **Permitted facilities:**

Notification of removal of a surface impoundment from service must be submitted to the Regional Administrator within 7 days after detection of a release. Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

### **WASTE PILES**

#### **Interim status facilities:**

Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

#### **Permitted facilities:**

Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

## **LAND TREATMENT**

### **Interim status facilities:**

Notification to the Regional Administrator that food crops are being grown, or have been grown and will be grown in the future, at a land treatment unit must be submitted within 60 days after the effective date of these regulations.

### **Permitted facilities:**

Notification of statistically significant contaminant increases must be submitted to the Regional Administrator within 7 days of determination. Notification of intent to make a demonstration under §264.278(h) must be submitted to the Regional Administrator within 7 days of the above determination, and the demonstration must be submitted within 90 days. Certification of closure must be submitted within 60 days of closure in accordance with §265.115. Demonstrations for exemption from §264.280(a) (8) and (c) may be submitted at any time during the closure or post-closure period, depending on the desire of the owner or operator to submit such a demonstration.

## **LANDFILLS**

### **Interim status facilities:**

Notification of intent to receive waste must be submitted to the Regional Administrator at least 60 days prior to receiving the waste. Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

### **Permitted facilities:**

Notification of an exceedance of the action leakage rate must be submitted to EPA within seven days, and a preliminary written assessment identifying the amount of liquids, likely sources, etc., must be submitted within 14 days of the determination of exceedance. Within 30 days after the notification of ALR exceedance, the analysis results must be submitted, along with the results of any actions taken, and actions planned.

## **THERMAL TREATMENT UNITS**

### **Interim status facilities:**

Owner/operators must submit documentation required under 40 CFR Part 265, Subpart P prior to burning EPA Hazardous Wastes F020, F021, F022, F023, F026, or F027. Unless the Director approves a later date, trial burn certification must be submitted within 90 days of completion. Data collected during the trial burn must be submitted following completion of the trial burn.

## **DRIP PADS**

### **Interim status facilities:**

Notification of a condition detected that may have caused or has caused a release of hazardous waste must be submitted to the EPA within 10 working days of the discovery.

### **Permitted facilities:**

Notification of a condition detected that may have caused or has caused a release of hazardous waste must be submitted to the EPA within 10 working days of the discovery.

## **PROCESS VENTS**

### **Permitted facilities:**

Owner/operators submit semiannual reports to EPA on dates specified by the Regional Administrator.

## **EQUIPMENT LEAKS**

### **Permitted facilities:**

Owner/operators submit semiannual reports to EPA on dates specified by the Regional Administrator.

## **CONTAINMENT BUILDINGS**

### **Interim status facilities:**

Owner/operators must submit notification of any condition that has caused a release within 7 days after the discovery of the condition. A description of the steps taken to repair the containment building, and a schedule for accomplishing the work must be submitted to EPA within 14 days after discovery of the condition.

### **Permitted facilities:**

Owner/operators must submit notification of any condition that has caused a release within 7 days after the discovery of the condition. A description of the steps taken to repair the containment building, and a schedule for accomplishing the work must be submitted to EPA within 14 days after discovery of the condition.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

EPA estimates respondent burden for both Private respondents (private sector businesses and industries) and Governments respondents (includes State, County, Municipal, District, and Tribal governments). Table 1 presents the estimated number of RCRA facilities with each specific type of existing interim status and permitted units that are expected to comply annually with the information collection requirements covered in this ICR.

EPA derived these data for this ICR from RCRAInfo. RCRAInfo is EPA's comprehensive information system which provides access to data supporting the implementation and management of the RCRA Subtitle C hazardous waste program. The data is entered into the system by States and EPA. RCRAInfo allows the Permitting Program to track facilities through the permitting process and communicate their performance and progress.

### **6(a) ESTIMATING RESPONDENT BURDEN**

EPA estimates respondent burden for units associated with all of the requirements covered in this ICR in Exhibits 1a through 12a for Private respondents and Exhibits 1b through 12b for Governments Respondents. The exhibits address the following specific unit requirements:

Exhibit 1a&b	--	Containers
Exhibit 2a&b	--	Tank systems
Exhibit 3a&b	--	Surface impoundments
Exhibit 4a&b	--	Waste piles
Exhibit 5a&b	--	Land treatment
Exhibit 6a&b	--	Landfills
Exhibit 7a&b	--	Incinerators
Exhibit 8a&b	--	Drip pads
Exhibit 9a&b	--	Miscellaneous units
Exhibit 10a&b	--	Process vents
Exhibit 11a&b	--	Equipment leaks
Exhibit 12a&b	--	Containment buildings

### **6(b) ESTIMATING RESPONDENT COSTS**

EPA estimates that the total annual respondent cost for all activities covered in this ICR is \$25,535,215 per year. This cost includes annual labor, capital, and operation and maintenance (O&M) costs to be incurred by respondents affected by the information collection requirements covered in this ICR. A more detailed discussion follows.

#### **Labor Rates**

EPA estimates an average hourly Private respondent labor cost (including overhead) of \$113.36 for legal staff, \$80.59 for managerial staff, \$38.83 for technical staff, and \$22.74 for clerical staff. These wage rates are based on the rates from last renewal, multiplied by an inflation rate of 3.4% to bring them up to 2016 rates. The burden hours presented in Exhibits 1a through 12a are used to estimate the Private respondent costs associated with all of the information collection activities covered in this ICR.

EPA estimates an average hourly non-federal governments respondent labor cost (including overhead) of \$60.45 for legal staff, \$56.75 for managerial staff, \$33.96 for technical staff, and \$21.66 for clerical staff. These wage rates are based on the rates from last renewal, multiplied by an inflation rate of 3.4% to bring them up to 2016 rates. The burden hours presented in Exhibits 1b through 12b are used to estimate the non-federal governments respondent costs associated with all of the information collection activities covered in this ICR.

### **Capital Costs**

EPA assumes that all facilities with interim status and permitted units already possess file storage systems, either for electronic or paper filing. Therefore, no capital costs will be incurred during the three year period of this ICR.

### **Operation and Maintenance Costs**

EPA also estimates that facilities will incur operation and maintenance (O&M) costs. O&M costs include postage for submittals of information or notices. EPA estimates that facilities will incur \$5.75 in postage costs for every submittal to EPA, based on the mailing cost of \$5.75 for a two-pound package. O&M costs also include purchased material costs and/or lump-sum purchased service costs (e.g., waste analyses, inspection/certification by an independent registered professional engineer). From O&M costs in Exhibits 13a and b (see Subsection 6(e)), EPA estimates that the total annual O&M cost for conducting respondent activities covered in the ICR is \$3,682,707.

### **6(c) ESTIMATING AGENCY BURDEN AND COST**

EPA estimates the Federal agency average hourly labor cost to be \$82.77 for legal staff (GS-15, Step 5), \$73.03 for managerial staff (GS-15, Step 1), \$52.54 for technical staff (GS-13, Step 1), and \$22.42 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2016. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.485 to the unloaded rate to derive loaded hourly rates. The burden hours presented in Exhibit 15 are used to estimate the federal costs associated with all of the information collection activities covered in this ICR.

EPA estimates an average hourly State agency labor cost (including overhead) of \$60.45 for legal staff, \$56.75 for managerial staff, \$33.96 for technical staff, and \$21.66 for clerical staff. These wage rates are based on the rates from last renewal, multiplied by an inflation rate of 3.4% to bring them up to 2016 rates. The burden hours presented in Exhibit 14b are used to estimate the State agency costs associated with all of the information collection activities covered in this ICR.

EPA assumes that EPA conducts only 10 percent of the agency activities and States conduct 90 percent of the agency activities.

### **6(d) ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COST**

#### **Respondent Universe**



EPA estimates respondent burden for both Private respondents (private sector businesses and industries) and Governments respondents (includes State, County, Municipal, District, and Tribal governments).

Table 1 presents the estimated number of RCRA facilities with interim status and permitted units for each specific unit type that are expected to comply annually with the information collection requirements covered in this ICR. For example, if a facility has three tank units and two incinerators, it counts as one for each specific unit type – one for tanks and one for incinerators. This facility would have units subject to three different specific unit type regulations (Subparts I, J, and O).

As shown in the Table 1, EPA estimates that annually a total of 4,543 facilities with specific unit types will be subject to the information collection requirements covered in this ICR. Of these, 85 units are interim status units and 4,458 are permitted units.

**Table 1  
Number of Interim Status and Permitted Units for Each Specific Unit Type  
Subject to Information Collection Requirements Covered in this ICR**

Specific Unit Type	Interim Status Units		Total Interim Status	Permitted Units		Total Permitted	Total Units
	Private	Governments		Private	Governments		
Subpart I - Containers	11	11	22	615	157	772	794
Subpart J – Tank Systems	1	1	2	766	61	827	829
Subpart K - Surface Impoundments	0	0	0	28	2	30	30
Subpart L - Waste Piles	0	0	0	4	3	7	7
Subpart M - Land Treatment	0	0	0	5	0	5	5
Subpart N - Landfills	0	0	0	43	0	43	43
Subpart O - Incinerators	0	0	0	39	5	44	44
Subpart W - Drip Pads	0	0	0	0	0	0	0
Subpart AA - Process Vents	18	3	21	742	80	822	843
Subpart BB - Equipment Leaks	35	3	38	1,752	127	1,879	1,917
Subpart DD - Containment Buildings	0	2	2	26	3	29	31
<b>TOTALS</b>	<b>65</b>	<b>20</b>	<b>85</b>	<b>4,020</b>	<b>438</b>	<b>4,458</b>	<b>4,543</b>

**6(e) BOTTOM LINE BURDEN HOURS AND COSTS**

Based on the universe data presented in Table 1, EPA estimates Private respondent and Governments respondent burden and costs associated with all the requirements covered in this ICR in Exhibits 1a and b through 12a and b, respectively. A discussion of the Private and Governments burden estimates presented in these exhibits follows; the data in the discussion is the sum of the respective Private respondent and Governments respondent burdens.

Respondent and Agency bottom line burden hours and costs are summarized in this subsection. The bottom line burden hours and cost to respondents and agencies are based on a three-year time-span over which the ICR is effective.

### **Respondent Tally**

Exhibits 13a and b below summarize, respectively, the total annual Private and non-federal Governments respondent burdens and costs associated with all the requirements covered in this ICR. Exhibit 15b summarizes the total annual state agency burdens and costs. For the sum of the three exhibits, EPA estimates the total annual respondent burden to be 654,097 hours at a total annual cost of \$25,535,215.

	Respondents	Responses	Hours	O&M/Capital
Private	4,085	6,889	533,373	\$3,333,098
State/Local	458	772	119,608	\$349,609
State Agencies	50	2,500	1,116	\$0
<b>Total</b>	<b>4,593</b>	<b>10,161</b>	<b>654,097</b>	<b>\$3,682,707</b>

### **Agency Tally**

Exhibits 15a below summarizes the total annual EPA burden and cost associated with all the requirements covered in this ICR. EPA estimates the total annual agency burden to be 1,479 hours at a total annual cost of \$75,360.

### **6(f) REASONS FOR CHANGE IN BURDEN**

There is an increase in burden of 17,085 hours over the previous ICR. This increase is mainly due to an increase in the number of tank systems reporting in RCRAInfo.

### **6(g) BURDEN STATEMENT**

The public (Private and non-federal governments respondents) reporting burden for each of the requirements covered in this ICR are listed in Exhibits 16a and b below.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 64 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2015-0808, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Resource Conservation and Recovery Act (RCRA) Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available through [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2015-0808 and OMB Control Number 2050-0050 in any correspondence.

<b>EXHIBIT 1a</b>											
<b>CONTAINERS - INTERIM STATUS FACILITIES</b>											
<b>ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES</b>											
<b>INFORMATION COLLECTION ACTIVITY</b>	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours/ Year</b>	<b>Labor Cost/ Year</b>	<b>Capital/ Startup Cost</b>	<b>O&amp;M Cost</b>	<b>Number of Res-pondents</b>	<b>Total Hours/ Year</b>	<b>Total Cost/ Year</b>
<b>Containers - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$465.96	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (265.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	11	9,352.50	\$30,966.93
<b>SUBTOTAL</b>	0.00	0.00	varies	0.00	varies	varies	varies	\$0.00	varies	9,352.50	\$30,966.93
<b>EXHIBIT 1a (CONTINUED)</b>											
<b>CONTAINERS - PERMITTED</b>											
<b>ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES</b>											
<b>INFORMATION COLLECTION ACTIVITY</b>	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours/ Year</b>	<b>Labor Cost/ Year</b>	<b>Capital/ Startup Cost</b>	<b>O&amp;M Cost</b>	<b>Number of Res-pondents</b>	<b>Total Hours/ Year</b>	<b>Total Cost/ Year</b>
<b>Containers- Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$465.96	\$0.00	\$0.00	0	576.00	\$0.00
<b>Inspections (264.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	615	65,032.50	\$1,731,332.63
<b>SUBTOTAL</b>	0.00	0.00	varies	0.00	varies	varies	varies	\$0.00	varies	65,608.50	\$1,731,332.63
<b>GRAND TOTAL</b>	0.00	0.00	varies	0.00	varies	varies	varies	\$0.00	varies	74,961.00	\$1,762,299.55

EXHIBIT 1b CONTAINERS - INTERIM STATUS FACILITIES ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Containers - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$407.52	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (265.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	11	9,352.50	\$27,083.10
<b>SUBTOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>varies</b>	<b>9,352.50</b>	<b>\$27,083.10</b>
EXHIBIT 1b (CONTINUED) CONTAINERS - PERMITTED ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Containers- Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$407.52	\$0.00	\$0.00	0	576.00	\$0.00
<b>Inspections (264.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	157	65,032.50	\$386,549.70
<b>SUBTOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>varies</b>	<b>65,608.50</b>	<b>\$386,549.70</b>
<b>GRAND TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>varies</b>	<b>74,961.00</b>	<b>\$413,632.80</b>

<b>EXHIBIT 2a</b>											
<b>TANK SYSTEMS - INTERIM STATUS FACILITIES</b>											
<b>ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES</b>											
<b>INFORMATION COLLECTION</b>	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours/Year</b>	<b>Labor Cost/Year</b>	<b>Capital/Startup Cost</b>	<b>O&amp;M Cost</b>	<b>Number of Respondents</b>	<b>Total Hours/Year</b>	<b>Total Cost/Year</b>
<b>ACTIVITY</b>											
<b>Tank Systems - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$465.96	\$0.00	\$0.00	0	0.00	\$0.00
<b>No free liquids demonstration (265.190(a))</b>											
Perform Paint Filter Liquids Test (40 times annually)	0.00	0.00	60.00	0.00	60.00	\$2,329.80	\$0.00	\$80.00	0	3.00	\$120.49
File test results at facility (40 times annually)	0.00	0.00	0.00	20.00	20.00	\$454.80	\$0.00	\$0.00	0	1.00	\$22.74
<b>Assessment of existing tank systems' integrity (265.191)</b>											
Perform the leak test (265.191(b)(5)(i) and (ii))	0.00	2.00	8.00	0.75	10.75	\$488.88	\$0.00	\$1,850.00	0	0.00	\$0.00
Prepare certified assessment	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$340.00	0	0.00	\$0.00
File assessment at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and installation of new tank systems or components (265.192)</b>											
Prepare, review, and certify written assessment	1.00	3.50	130.00	3.00	137.50	\$5,511.55	\$0.00	\$6,300.00	0	0.00	\$0.00
Obtain written statements from certifier of tank design and supervisor of its installation	0.00	0.00	0.50	0.50	1.00	\$30.79	\$0.00	\$0.00	0	0.00	\$0.00
Maintain the statements at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1	0.50	\$11.37
<b>Equivalent containment devices (265.193(d)(4))</b>											
Gather information that the device is equivalent to a liner, vault, or double-walled tank	1.00	2.50	20.00	2.50	26.00	\$1,148.29	\$0.00	\$10,000.00	0	8.58	\$3,678.93
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.17	\$4.74
<b>Exemption from 24-hour leak detection requirement (265.193(e)(3)(iii))</b>											
Compile evidence that the LDS cannot detect failure or contamination within 24 hours	1.00	1.00	10.00	1.00	13.00	\$604.99	\$0.00	\$5,000.00	0	0.00	\$0.00
Submit evidence to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Variance from secondary containment requirements (265.193(g))</b>											
Prepare and submit notification of intent to conduct demonstration	0.00	0.50	1.50	0.50	2.50	\$109.91	\$0.00	\$3.00	0	0.00	\$0.00
Prepare the demonstration	0.00	1.00	20.00	1.00	22.00	\$879.93	\$0.00	\$3,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Annual leak tests and inspections (265.193(i))</b>											
For non-enterable underground tanks conduct leak tests (265.191(b)(5))	0.00	0.00	8.00	0.75	8.75	\$327.70	\$0.00	\$1,850.00	0	0.00	\$0.00
For other tanks/ancillary equipment, conduct annual leak tests/inspections	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$1,850.00	0	0.00	\$0.00
Record inspection and test results	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (265.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	1	72.50	\$2,815.18
<b>Exemption from 24-hour waste removal requirement (265.196(b))</b>											
Compile evidence that, within 24 hours, enough waste cannot be removed to prevent further release and allow for inspection and repair	0.00	0.50	4.00	0.50	5.00	\$206.99	\$0.00	\$2,000.00	0	0.41	\$182.08
Submit evidence to the Region	0.00	0.00	0.00	0.30	0.30	\$6.82	\$0.00	\$3.00	0	0.02	\$0.81
<b>Release notifications and reports (265.196(d)); major repair certification (265.196(f))</b>											
Notify the Region of release	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	0	0.00	\$0.00
Prepare report on the release	0.00	1.00	7.50	1.00	9.50	\$394.56	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$89.03	\$0.00	\$340.00	0	0.00	\$0.00
Submit certification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Decontamination demonstration (265.197)</b>											
Prepare decontamination demonstration	0.00	0.50	3.00	0.50	4.00	\$168.16	\$0.00	\$600.00	0	0.00	\$0.00
Submit demonstration to EPA	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Waste analysis and trial tests (265.200)</b>											
Conduct waste analyses and trial tests	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$750.00	0	0.00	\$0.00
Obtain written, documented information to show that the proposed treatment or storage will meet the requirements of §265.194(a)	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$0.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>86.18</b>	<b>\$6,836.34</b>

EXHIBIT 2a (CONTINUED)											
TANK SYSTEMS - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Tank Systems - Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$465.96	\$0.00	\$0.00	0	0.00	\$0.00
<b>No free liquids demonstration (264.190(a))</b>											
Perform Paint Filter Liquids Tests (40 times annually)	0.00	0.00	60.00	0.00	60.00	\$2,329.80	\$0.00	\$80.00	8	480.00	\$19,278.40
File test results at facility (40 times annually)	0.00	0.00	0.00	20.00	20.00	\$454.80	\$0.00	\$0.00	8	160.00	\$3,638.40
<b>Assessment of existing tank systems' integrity (264.191)</b>											
Perform the leak test (265.191(b)(5)(i) and (ii))	0.00	2.00	8.00	0.75	10.75	\$488.88	\$0.00	\$1,850.00	0	0.00	\$0.00
Prepare certified assessment	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$340.00	0	0.00	\$0.00
File assessment at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and installation of new tank systems or components (264.192)</b>											
Obtain written statements from those who certified the tank system design and supervised its installation	0.00	0.00	0.50	0.50	1.00	\$30.79	\$0.00	\$0.00	0	0.00	\$0.00
Maintain statements at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	766	383.00	\$8,709.42
<b>Annual leak tests and inspections (264.193(i))</b>											
For non-enterable underground tanks, conduct a leak test (264.191(b)(5))	0.00	0.00	8.00	0.75	8.75	\$327.70	\$0.00	\$1,850.00	0	0.00	\$0.00
For all other tanks and ancillary equipment, conduct annual leak tests or develop a schedule for assessing the condition of the tank system	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$1,850.00	0	0.00	\$0.00
Record inspections and test results	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (264.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	766	55,535.00	\$2,156,424.05
<b>Exemption from the 24-hour waste removal requirement (264.196(b))</b>											
Compile evidence that, within 24 hours, enough waste cannot be removed to prevent further release and allow for inspection and repair	0.00	0.50	4.00	0.50	5.00	\$206.99	\$0.00	\$1,850.00	63	315.00	\$129,590.06
Submit evidence to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	63	31.50	\$905.31
<b>Release notifications and reports (264.196(d)); major repair certifications (264.196(f))</b>											
Notify the Region of release	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	192	144.00	\$9,404.16
Prepare report on the release	0.00	1.00	7.50	1.00	9.50	\$394.56	\$0.00	\$0.00	192	1,824.00	\$75,754.56
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$89.03	\$0.00	\$340.00	2	5.00	\$858.06
Submit certification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	2	1.00	\$28.74
<b>Decontamination demonstration (264.197)</b>											
Prepare decontamination demonstration	0.00	0.50	3.00	0.50	4.00	\$168.16	\$0.00	\$600.00	0	0.00	\$0.00
Submit demonstration to EPA	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	58,878.50	\$2,404,591.16
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	58,964.68	\$2,411,427.49

EXHIBIT 2b TANK SYSTEMS - INTERIM STATUS FACILITIES ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Tank Systems - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$407.52	\$0.00	\$0.00	0	0.00	\$0.00
<b>No free liquids demonstration (265.190(a))</b>											
Perform Paint Filter Liquids Test (40 times annually)	0.00	0.00	60.00	0.00	60.00	\$2,037.60	\$0.00	\$80.00	0	3.00	\$105.88
File test results at facility (40 times annually)	0.00	0.00	0.00	20.00	20.00	\$433.20	\$0.00	\$0.00	0	1.00	\$21.66
<b>Assessment of existing tank systems' integrity (265.191)</b>											
Perform the leak test (265.191(b)(5)(i) and (ii))	0.00	2.00	8.00	0.75	10.75	\$401.43	\$0.00	\$1,850.00	0	0.00	\$0.00
Prepare certified assessment	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$340.00	0	0.00	\$0.00
File assessment at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and installation of new tank systems or components (265.192)</b>											
Prepare, review, and certify written assessment	1.00	3.50	130.00	3.00	137.50	\$4,738.86	\$0.00	\$6,300.00	0	0.00	\$0.00
Obtain written statements from certifier of tank design and supervisor of its installation	0.00	0.00	0.50	0.50	1.00	\$27.81	\$0.00	\$0.00	0	0.00	\$0.00
Maintain the statements at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	1	0.50	\$10.83
<b>Equivalent containment devices (265.193(d)(4))</b>											
Gather information that the device is equivalent to a liner, vault, or double-walled tank	1.00	2.50	20.00	2.50	26.00	\$935.68	\$0.00	\$10,000.00	0	8.58	\$3,608.77
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.17	\$4.56
<b>Exemption from 24-hour leak detection requirement (265.193(e)(3)(iii))</b>											
Compile evidence that the LDS cannot detect failure or contamination within 24 hours	1.00	1.00	10.00	1.00	13.00	\$478.46	\$0.00	\$5,000.00	0	0.00	\$0.00
Submit evidence to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Variance from secondary containment requirements (265.193(g))</b>											
Prepare and submit notification of intent to conduct demonstration	0.00	0.50	1.50	0.50	2.50	\$90.15	\$0.00	\$3.00	0	0.00	\$0.00
Prepare the demonstration	0.00	1.00	20.00	1.00	22.00	\$757.61	\$0.00	\$3,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Annual leak tests and inspections (265.193(i))</b>											
For non-enterable underground tanks conduct leak tests (265.191(b)(5))	0.00	0.00	8.00	0.75	8.75	\$287.93	\$0.00	\$1,850.00	0	0.00	\$0.00
For other tanks/ancillary equipment, conduct annual leak tests/inspections	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$1,850.00	0	0.00	\$0.00
Record inspection and test results	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (265.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	1	72.50	\$2,462.10
<b>Exemption from 24-hour waste removal requirement (265.196(b))</b>											
Compile evidence that, within 24 hours, enough waste cannot be removed to prevent further release and allow for inspection and repair	0.00	0.50	4.00	0.50	5.00	\$175.05	\$0.00	\$2,000.00	0	0.41	\$179.44
Submit evidence to the Region	0.00	0.00	0.00	0.30	0.30	\$6.50	\$0.00	\$3.00	0	0.02	\$0.78
<b>Release notifications and reports (265.196(d)); major repair certification (265.196(f))</b>											
Notify the Region of release	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	0	0.00	\$0.00
Prepare report on the release	0.00	1.00	7.50	1.00	9.50	\$333.11	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$78.75	\$0.00	\$340.00	0	0.00	\$0.00
Submit certification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Decontamination demonstration (265.197)</b>											
Prepare decontamination demonstration	0.00	0.50	3.00	0.50	4.00	\$141.09	\$0.00	\$600.00	0	0.00	\$0.00
Submit demonstration to EPA	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Waste analysis and trial tests (265.200)</b>											
Conduct waste analyses and trial tests	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$750.00	0	0.00	\$0.00
Obtain written, documented information to show that the proposed treatment or storage will meet the requirements of §265.194(a)	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$0.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	86.18	\$6,394.03



EXHIBIT 2b (CONTINUED)											
TANK SYSTEMS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Tank Systems - Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	12.00	0.00	12.00	\$407.52	\$0.00	\$0.00	0	0.00	\$0.00
<b>No free liquids demonstration (264.190(a))</b>											
Perform Paint Filter Liquids Tests (40 times annually)	0.00	0.00	60.00	0.00	60.00	\$2,037.60	\$0.00	\$80.00	1	60.00	\$2,117.60
File test results at facility (40 times annually)	0.00	0.00	0.00	20.00	20.00	\$433.20	\$0.00	\$0.00	1	20.00	\$433.20
<b>Assessment of existing tank systems' integrity (264.191)</b>											
Perform the leak test (265.191(b)(5)(i) and (ii))	0.00	2.00	8.00	0.75	10.75	\$401.43	\$0.00	\$1,850.00	0	0.00	\$0.00
Prepare certified assessment	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$340.00	0	0.00	\$0.00
File assessment at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and installation of new tank systems or components (264.192)</b>											
Obtain written statements from those who certified the tank system design and supervised its installation	0.00	0.00	0.50	0.50	1.00	\$27.81	\$0.00	\$0.00	0	0.00	\$0.00
Maintain statements at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	61	30.50	\$660.63
<b>Annual leak tests and inspections (264.193(i))</b>											
For non-enterable underground tanks, conduct a leak test (264.191(b)(5))	0.00	0.00	8.00	0.75	8.75	\$287.93	\$0.00	\$1,850.00	0	0.00	\$0.00
For all other tanks and ancillary equipment, conduct annual leak tests or develop a schedule for assessing the condition of the tank system	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$1,850.00	0	0.00	\$0.00
Record inspections and test results	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (264.195)</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	61	4,422.50	\$150,188.10
<b>Exemption from the 24-hour waste removal requirement (264.196(b))</b>											
Compile evidence that, within 24 hours, enough waste cannot be removed to prevent further release and allow for inspection and repair	0.00	0.50	4.00	0.50	5.00	\$175.05	\$0.00	\$1,850.00	5	25.00	\$10,125.23
Submit evidence to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	5	2.50	\$69.15
<b>Release notifications and reports (264.196(d)); major repair certifications (264.196(f))</b>											
Notify the Region of release	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	15	11.25	\$551.85
Prepare report on the release	0.00	1.00	7.50	1.00	9.50	\$333.11	\$0.00	\$0.00	15	142.50	\$4,996.65
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$78.75	\$0.00	\$340.00	0	0.00	\$0.00
Submit certification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Decontamination demonstration (264.197)</b>											
Prepare decontamination demonstration	0.00	0.50	3.00	0.50	4.00	\$141.09	\$0.00	\$600.00	0	0.00	\$0.00
Submit demonstration to EPA	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	4,714.25	\$169,142.41
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	4,800.43	\$175,536.44

EXHIBIT 3a SURFACE IMPOUNDMENTS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Surface Impoundments - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and operating requirements (265.221) and (265.222)</b>											
Prepare and submit written assessment of alternative design and operating practices to EPA or authorized State	1.00	1.00	2.00	1.00	5.00	\$294.35	\$0.00	\$5,000.00	0	0.00	\$0.00
File and maintain assessment and related data at facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit the notification of intent	0.00	1.00	0.00	0.25	1.25	\$86.28	\$0.00	\$3.00	0	0.00	\$0.00
Prepare written identification of alternate design features or operating plans to prevent overtopping of a dike	0.00	0.00	3.00	0.50	3.50	\$127.86	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification that alternate design/operating plans prevent overtopping	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$340.00	0	0.00	\$0.00
Maintain certification and written identification at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.222(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$200.41	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.222(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.223(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$3,187.74	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.55	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.223(b))</b>											
Notify EPA, in writing, of the exceedance within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$846.96	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$886.19	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,532.74	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (average of 6 times per year)	0.00	0.00	6.00	6.00	12.00	\$369.42	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.223(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$788.32	\$0.00	\$800.00	0	0.00	\$0.00
<b>Waste analysis and trial tests (265.225)</b>											
Conduct waste analyses	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$750.00	0	0.00	\$0.00
Obtain written, documented information to show that the treatment will comply with §265.17(b)	0.00	0.00	1.00	0.50	1.50	\$50.20	\$0.00	\$0.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.226(b)(1))</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	0	0.00	\$0.00
<b>Develop and Submit Pump Operating Level (265.226(b)(3))</b>											
Develop and submit to EPA	0.00	0.00	3.75	0.00	3.75	\$145.61	\$0.00	\$3.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.25	0.25	\$5.69	\$0.00	\$0.00	0	0.00	\$0.00
<b>Requirements for Ignitable or reactive waste (265.229)</b>											
Obtain the certification (265.229)	0.00	0.00	2.50	1.00	3.50	\$119.82	\$0.00	\$340.00	0	0.00	\$0.00
Maintain the certification and related data at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Closure (265.113(e))</b>											
Prepare and submit contingent corrective measures plan	0.00	0.00	8.00	0.50	8.50	\$322.01	\$0.00	\$5,000.00	0	0.00	\$0.00
Prepare and submit hazardous waste removal plan	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit extension request	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit corrective action report (2 times annually)	0.00	0.00	2.00	0.25	2.25	\$83.35	\$0.00	\$18.00	0	0.00	\$0.00
<b>TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 3a (CONTINUED)											
SURFACE IMPOUNDMENTS - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Surface Impoundments - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (264.222(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	1	21.00	\$828.27
<b>Action Leakage Reporting (264.223(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$846.96	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$886.19	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	5.90	29.50	1.90	37.30	\$1,664.17	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (average of 6 times per year)	0.00	0.00	6.00	6.00	12.00	\$369.42	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (264.223(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$788.32	\$0.00	\$800.00	0	0.00	\$0.00
<b>Dike re-certification (264.226(c))</b>											
Obtain certification that the impoundment's dike has structural integrity	0.00	0.00	3.00	0.50	3.50	\$127.86	\$0.00	\$340.00	3	10.50	\$1,403.58
Maintain certification and related data at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	3	1.50	\$34.11
<b>Monitoring and Inspections (264.226(d)(1))</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,815.18	\$0.00	\$0.00	28	2,030.00	\$78,824.90
<b>Emergency repairs and contingency plans (264.227)</b>											
Notify the Region in writing	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	0	0.00	\$0.00
Maintain related data	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$89.03	\$0.00	\$340.00	0	0.00	\$0.00
Maintain certification on file	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Closure (264.113(e))</b>											
Prepare and submit contingent corrective measures plan	0.00	0.00	8.00	0.50	8.50	\$322.01	\$0.00	\$5,000.00	0	0.00	\$0.00
Prepare and submit hazardous waste removal plan	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit extension request	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit corrective action report (2 times annually)	0.00	0.00	2.00	0.25	2.25	\$83.35	\$0.00	\$18.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,063.00	\$81,090.86
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,063.00	\$81,090.86

EXHIBIT 3b SURFACE IMPOUNDMENTS - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Surface Impoundments - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design and operating requirements (265.221) and (265.222)</b>											
Prepare and submit written assessment of alternative design and operating practices to EPA or authorized State	1.00	1.00	2.00	1.00	5.00	\$206.78	\$0.00	\$5,000.00	0	0.00	\$0.00
File and maintain assessment and related data at facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit the notification of intent	0.00	1.00	0.00	0.25	1.25	\$62.17	\$0.00	\$3.00	0	0.00	\$0.00
Prepare written identification of alternate design features or operating plans to prevent overtopping of a dike	0.00	0.00	3.00	0.50	3.50	\$112.71	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification that alternate design/operating plans prevent overtopping	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$340.00	0	0.00	\$0.00
Maintain certification and written identification at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.222(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$163.31	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.222(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.223(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$2,515.06	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.33	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.223(b))</b>											
Notify EPA, in writing, of the exceedance within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$701.31	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$751.12	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,289.12	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (average of 6 times per year)	0.00	0.00	6.00	6.00	12.00	\$333.72	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.223(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$634.52	\$0.00	\$800.00	0	0.00	\$0.00
<b>Waste analysis and trial tests (265.225)</b>											
Conduct waste analyses	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$750.00	0	0.00	\$0.00
Obtain written, documented information to show that the treatment will comply with §265.17(b)	0.00	0.00	1.00	0.50	1.50	\$44.79	\$0.00	\$0.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.226(b)(1))</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	0	0.00	\$0.00
<b>Develop and Submit Pump Operating Level (265.226(b)(3))</b>											
Develop and submit to EPA	0.00	0.00	3.75	0.00	3.75	\$127.35	\$0.00	\$3.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.25	0.25	\$5.42	\$0.00	\$0.00	0	0.00	\$0.00
<b>Requirements for ignitable or reactive waste (265.229)</b>											
Obtain the certification (265.229)	0.00	0.00	2.50	1.00	3.50	\$106.56	\$0.00	\$340.00	0	0.00	\$0.00
Maintain the certification and related data at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Closure (265.113(e))</b>											
Prepare and submit contingent corrective measures plan	0.00	0.00	8.00	0.50	8.50	\$282.51	\$0.00	\$5,000.00	0	0.00	\$0.00
Prepare and submit hazardous waste removal plan	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit extension request	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit corrective action report (2 times annually)	0.00	0.00	2.00	0.25	2.25	\$73.34	\$0.00	\$18.00	0	0.00	\$0.00
<b>TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 3b (CONTINUED)											
SURFACE IMPOUNDMENTS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Surface Impoundments - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (264.222(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	1	21.00	\$718.41
<b>Action Leakage Reporting (264.223(b))</b>											
Notify EPA, in writing, of the exceedance within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$701.31	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$751.12	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	5.90	29.50	1.90	37.30	\$1,377.80	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (average of 6 times per year)	0.00	0.00	6.00	6.00	12.00	\$333.72	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (264.223(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$634.52	\$0.00	\$800.00	0	0.00	\$0.00
<b>Dike re-certification (264.226(c))</b>											
Obtain certification that the impoundment's dike has structural integrity	0.00	0.00	3.00	0.50	3.50	\$112.71	\$0.00	\$340.00	0	0.00	\$0.00
Maintain certification and related data at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Monitoring and Inspections (264.226(d)(1))</b>											
Record all inspection data	0.00	0.00	72.50	0.00	72.50	\$2,462.10	\$0.00	\$0.00	2	145.00	\$4,924.20
<b>Emergency repairs and contingency plans (264.227)</b>											
Notify the Region in writing	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	0	0.00	\$0.00
Maintain related data	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
Obtain certification	0.00	0.00	2.00	0.50	2.50	\$78.75	\$0.00	\$340.00	0	0.00	\$0.00
Maintain certification on file	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Closure (264.113(e))</b>											
Prepare and submit contingent corrective measures plan	0.00	0.00	8.00	0.50	8.50	\$282.51	\$0.00	\$5,000.00	0	0.00	\$0.00
Prepare and submit hazardous waste removal plan	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit extension request	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit corrective action report (2 times annually)	0.00	0.00	2.00	0.25	2.25	\$73.34	\$0.00	\$18.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	166.00	\$5,642.61
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	166.00	\$5,642.61



EXHIBIT 4a WASTE PILES - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Waste Piles - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00
<b>Waste analysis (265.252)</b>											
Conduct waste analyses	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$750.00	0	0.00	\$0.00
<b>Exemption from design and operating requirements (265.254)</b>											
Gather the information necessary for exemption from liner/leachate system requirements	0.00	0.50	8.00	1.00	9.50	\$373.68	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Variance from design and operating requirements (265.254)</b>											
Gather the information necessary for variance from liner/leachate system requirements	0.00	0.50	8.00	1.00	9.50	\$373.68	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.255(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$200.41	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	1.00	1.00	\$22.74	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.255(c))</b>											
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.259(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$3,187.74	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.55	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.259(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$846.96	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$886.19	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,532.74	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	0.00	6.00	\$232.98	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.259(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$788.32	\$0.00	\$800.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.260)</b>											
Record all inspection data	0.00	0.00	13.00	4.00	17.00	\$595.75	\$0.00	\$0.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 4a (CONTINUED)											
WASTE PILES - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Waste Piles - Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	0.25	0.00	0.25	\$9.71	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (264.252(c))</b>											
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (264.253(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$846.96	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$886.19	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,532.74	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	6.00	12.00	\$369.42	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (264.253(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$788.32	\$0.00	\$800.00	0	0.00	\$0.00
<b>Monitoring and Inspections (264.254(c))</b>											
Record all inspection data	0.00	0.00	13.00	4.00	17.00	\$595.75	\$0.00	\$0.00	4	68.00	\$2,383.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	68.00	\$2,383.00
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	68.00	\$2,383.00





EXHIBIT 4b WASTE PILES - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Waste Piles - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00
<b>Waste analysis (265.252)</b>											
Conduct waste analyses	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$750.00	0	0.00	\$0.00
<b>Exemption from design and operating requirements (265.254)</b>											
Gather the information necessary for exemption from liner/leachate system requirements	0.00	0.50	8.00	1.00	9.50	\$321.72	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Variance from design and operating requirements (265.254)</b>											
Gather the information necessary for variance from liner/leachate system requirements	0.00	0.50	8.00	1.00	9.50	\$321.72	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.255(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$163.31	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	1.00	1.00	\$21.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.255(c))</b>											
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.259(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$2,515.06	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.33	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.259(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$701.31	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$751.12	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,289.12	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	0.00	6.00	\$203.76	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.259(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$634.52	\$0.00	\$800.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.260)</b>											
Record all inspection data	0.00	0.00	13.00	4.00	17.00	\$528.12	\$0.00	\$0.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 4b (CONTINUED)											
WASTE PILES - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Waste Piles - Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	0.25	0.00	0.25	\$8.49	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (264.252(c))</b>											
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (264.253(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	15.00	1.00	19.00	\$701.31	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	2.00	17.50	2.00	21.50	\$751.12	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	4.00	30.00	2.00	36.00	\$1,289.12	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	6.00	12.00	\$333.72	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (264.253(c))</b>											
Conduct remediation determination analyses	0.00	4.00	12.00	0.00	16.00	\$634.52	\$0.00	\$800.00	0	0.00	\$0.00
<b>Monitoring and Inspections (264.254(c))</b>											
Record all inspection data	0.00	0.00	13.00	4.00	17.00	\$528.12	\$0.00	\$0.00	3	51.00	\$1,584.36
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	51.00	\$1,584.36
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	51.00	\$1,584.36

EXHIBIT 5a LAND TREATMENT - PERMITTED ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Land Treatment - Permitted</b>											
<b>Read the regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>Food-chain crops (264.276)</b>											
Maintain food-chain crop documentation at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
Develop and maintain operating plan (264.276(b)(2)(iii))	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$0.00	0	0.00	\$0.00
<b>Unsaturated zone monitoring (264.278)</b>											
Prepare and submit a notice of statistically significant increases	0.00	0.50	10.00	1.00	11.50	\$451.34	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit notice of intent to make a demonstration	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit report	0.00	2.00	6.00	2.00	10.00	\$439.64	\$0.00	\$3.00	0	0.00	\$0.00
<b>Closure and post-closure care (264.280)</b>											
Obtain certification of closure	0.00	0.00	0.50	0.50	1.00	\$30.79	\$0.00	\$340.00	0	0.00	\$0.00
Submit the certification to EPA	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration	0.00	10.00	80.00	10.00	100.00	\$4,139.70	\$0.00	\$9,000.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 5b LAND TREATMENT - PERMITTED ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Land Treatment - Permitted</b>											
<b>Read the regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00
<b>Food-chain crops (264.276)</b>											
Maintain food-chain crop documentation at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
Develop and maintain operating plan (264.276(b)(2)(iii))	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$0.00	0	0.00	\$0.00
<b>Unsaturated zone monitoring (264.278)</b>											
Prepare and submit a notice of statistically significant increases	0.00	0.50	10.00	1.00	11.50	\$389.64	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit notice of intent to make a demonstration	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit report	0.00	2.00	6.00	2.00	10.00	\$360.58	\$0.00	\$3.00	0	0.00	\$0.00
<b>Closure and post-closure care (264.280)</b>											
Obtain certification of closure	0.00	0.00	0.50	0.50	1.00	\$27.81	\$0.00	\$340.00	0	0.00	\$0.00
Submit the certification to EPA	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration	0.00	10.00	80.00	10.00	100.00	\$3,500.90	\$0.00	\$9,000.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00



EXHIBIT 6a LANDFILLS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Landfills - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design Requirements (265.301)</b>											
Prepare and submit notification of intention to receive waste	0.00	0.00	0.00	0.25	0.25	\$5.69	\$0.00	\$3.00	0	0.00	\$0.00
Collect the required information	0.00	0.50	7.25	0.50	8.25	\$333.18	\$0.00	\$0.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
Collect the required information for waiver of the double liner requirement	0.00	1.00	8.00	1.00	10.00	\$413.97	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.302(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$200.41	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.302(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.303(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$3,187.74	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.55	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.303(b))</b>											
Notify EPA, in writing, of the exceedance within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	20.00	1.00	24.00	\$1,041.11	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	3.00	3.50	1.00	7.50	\$400.42	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	6.00	30.00	2.00	38.00	\$1,693.92	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (6 times a year)	0.00	0.00	1.00	1.00	2.00	\$61.57	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.303(c))</b>											
Conduct remediation determination analyses	0.00	11.00	76.00	8.00	95.00	\$4,019.49	\$0.00	\$36,000.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.304(b))</b>											
Record all inspection data	0.00	0.00	26.00	4.00	30.00	\$1,100.54	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Pump Operating Level (265.304(c))</b>											
Develop and submit to EPA	0.00	0.00	3.75	0.50	4.25	\$156.98	\$0.00	\$0.00	0	0.00	\$0.00
<b>Special requirements for bulk and containerized liquids (265.314)</b>											
Record and file the observation results	0.00	0.00	2.00	10.00	12.00	\$305.06	\$0.00	\$0.00	0	0.00	\$0.00
Gather information necessary for the demonstration (265.314(f))	0.00	0.00	8.00	0.50	8.50	\$322.01	\$0.00	\$0.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 6a (CONTINUED)											
LANDFILLS - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Landfills - Permitted</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	11.00	2.00	0.00	13.00	\$964.15	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (264.302(c))</b>											
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$828.27	\$0.00	\$0.00	0	0.00	\$0.00
<b>Monitoring and Inspections (264.303(c)(1))</b>											
Record all inspection data	0.00	0.00	26.00	4.00	30.00	\$1,100.54	\$0.00	\$0.00	43	1,290.00	\$47,323.22
<b>Action Leakage Reporting (264.304(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$179.53	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$10,840.88	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	20.00	1.00	24.00	\$1,041.11	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	3.00	3.50	1.00	7.50	\$400.42	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	6.00	30.00	2.00	38.00	\$1,693.92	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	6.00	12.00	\$369.42	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (264.304(c))</b>											
Conduct remediation determination analyses	0.00	11.00	76.00	8.00	95.00	\$4,019.49	\$0.00	\$36,000.00	0	0.00	\$0.00
<b>Special requirements for bulk and containerized liquids (264.314)</b>											
Record and file the observation results	0.00	0.00	2.00	10.00	12.00	\$305.06	\$0.00	\$0.00	22	264.00	\$6,711.32
Gather information necessary for the demonstration (265.314(f))	0.00	0.00	8.00	0.50	8.50	\$322.01	\$0.00	\$0.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,554.00	\$54,034.54
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,554.00	\$54,034.54



EXHIBIT 6b LANDFILLS - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Landfills - Interim Status</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00
<b>Design Requirements (265.301)</b>											
Prepare and submit notification of intention to receive waste	0.00	0.00	0.00	0.25	0.25	\$5.42	\$0.00	\$3.00	0	0.00	\$0.00
Collect the required information	0.00	0.50	7.25	0.50	8.25	\$285.42	\$0.00	\$0.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
Collect the required information for waiver of the double liner requirement	0.00	1.00	8.00	1.00	10.00	\$350.09	\$0.00	\$25,000.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Action Leakage Rates (265.302(a))</b>											
Develop and submit to EPA	0.00	1.00	2.50	1.00	4.50	\$163.31	\$0.00	\$3,750.00	0	0.00	\$0.00
Maintain results of analyses	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Calculate Average Daily Flow Rates (265.302(c))</b>											
Calculate flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	0	0.00	\$0.00
<b>Reporting and Recordkeeping of Response Action Plans (265.303(a))</b>											
Complete the RAP	0.00	20.00	40.00	1.00	61.00	\$2,515.06	\$0.00	\$0.00	0	0.00	\$0.00
Submit the RAP to EPA	0.00	0.00	0.00	0.20	0.20	\$4.33	\$0.00	\$3.00	0	0.00	\$0.00
Maintain records of analyses	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Action Leakage Reporting (265.303(b))</b>											
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	20.00	1.00	24.00	\$871.11	\$0.00	\$0.00	0	0.00	\$0.00
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	3.00	3.50	1.00	7.50	\$310.77	\$0.00	\$0.00	0	0.00	\$0.00
Determine short-term and long-term actions necessary to mitigate the leak	0.00	6.00	30.00	2.00	38.00	\$1,402.62	\$0.00	\$0.00	0	0.00	\$0.00
Compile and submit information to EPA each month the ALR is exceeded (6 times a year)	0.00	0.00	1.00	1.00	2.00	\$55.62	\$0.00	\$18.00	0	0.00	\$0.00
<b>Remediation Determination Analyses (265.303(c))</b>											
Conduct remediation determination analyses	0.00	11.00	76.00	8.00	95.00	\$3,378.49	\$0.00	\$36,000.00	0	0.00	\$0.00
<b>Monitoring and Inspections (265.304(b))</b>											
Record all inspection data	0.00	0.00	26.00	4.00	30.00	\$969.60	\$0.00	\$3.00	0	0.00	\$0.00
<b>Develop and Submit Pump Operating Level (265.304(c))</b>											
Develop and submit to EPA	0.00	0.00	3.75	0.50	4.25	\$138.18	\$0.00	\$0.00	0	0.00	\$0.00
<b>Special requirements for bulk and containerized liquids (265.314)</b>											
Record and file the observation results	0.00	0.00	2.00	10.00	12.00	\$284.52	\$0.00	\$0.00	0	0.00	\$0.00
Gather information necessary for the demonstration (265.314(f))	0.00	0.00	8.00	0.50	8.50	\$282.51	\$0.00	\$0.00	0	0.00	\$0.00
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 6b (CONTINUED)												
LANDFILLS - PERMITTED												
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year	
<b>Landfills - Permitted</b>												
<b>Read the Regulations</b>												
Read the Regulations	0.00	11.00	2.00	0.00	13.00	\$692.17	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Calculate Average Daily Flow Rates (264.302(c))</b>												
Calculate average daily flow rates	0.00	0.50	20.00	0.50	21.00	\$718.41	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Monitoring and Inspections (264.303(c)(1))</b>												
Record all inspection data	0.00	0.00	26.00	4.00	30.00	\$969.60	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Action Leakage Reporting (264.304(b))</b>												
Notify EPA, in writing, of the exceedence within 7 days	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$3.00	0	0.00	\$0.00	
Submit a written assessment to the Regional Administrator within 14 days of the determination	0.00	0.50	3.00	1.00	4.50	\$151.92	\$0.00	\$3.00	0	0.00	\$0.00	
Determine the location, size, and cause of any leak	0.00	26.00	210.00	26.00	262.00	\$9,170.26	\$0.00	\$0.00	0	0.00	\$0.00	
Determine whether the unit should stop or curtail waste receipt	0.00	3.00	20.00	1.00	24.00	\$871.11	\$0.00	\$0.00	0	0.00	\$0.00	
Determine whether waste should be removed from the unit or the unit should be closed down	0.00	3.00	3.50	1.00	7.50	\$310.77	\$0.00	\$0.00	0	0.00	\$0.00	
Determine short-term and long-term actions necessary to mitigate the leak	0.00	6.00	30.00	2.00	38.00	\$1,402.62	\$0.00	\$0.00	0	0.00	\$0.00	
Compile and submit information to EPA each month the ALR is exceeded	0.00	0.00	6.00	6.00	12.00	\$333.72	\$0.00	\$18.00	0	0.00	\$0.00	
<b>Remediation Determination Analyses (264.304(c))</b>												
Conduct remediation determination analyses	0.00	11.00	76.00	8.00	95.00	\$3,378.49	\$0.00	\$36,000.00	0	0.00	\$0.00	
<b>Special requirements for bulk and containerized liquids (264.314)</b>												
Record and file the observation results	0.00	0.00	2.00	10.00	12.00	\$284.52	\$0.00	\$0.00	0	0.00	\$0.00	
Gather information necessary for the demonstration (265.314(f))	0.00	0.00	8.00	0.50	8.50	\$282.51	\$0.00	\$0.00	0	0.00	\$0.00	
Submit information to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00	
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00	
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00	



EXHIBIT 7a INCINERATORS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Incinerators - Interim Status</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>Applicability (265.340(b))</b>											
Determine whether waste meets the requirements and document the fact in writing	0.00	0.50	8.00	0.50	9.00	\$362.31	\$0.00	\$0.00	0	0.00	\$0.00
File documentation at the facility	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
<b>Waste analysis (265.341)</b>											
Conduct waste analysis	0.00	0.00	5.00	0.00	5.00	\$194.15	\$0.00	\$750.00	0	0.00	\$0.00
<b>Monitoring and inspections (265.347(b))</b>											
Inspect the complete incinerator and associated equipment, at least daily	0.00	0.00	1.50	0.00	1.50	\$58.25	\$0.00	\$0.00	0	0.00	\$0.00
Inspect all emergency shutdown controls and system alarms	0.00	0.00	1.50	0.00	1.50	\$58.25	\$0.00	\$0.00	0	0.00	\$0.00
<b>Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027 (265.352(b)(1))</b>											
Complete the application demonstrating that the incinerator can meet performance standards	0.00	25.00	200.00	25.00	250.00	\$10,349.25	\$0.00	\$100,000.00	0	0.00	\$0.00
Submit the application	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 7a (CONTINUED) INCINERATORS - PERMITTED ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Incinerators - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>Notification of intent to burn hazardous wastes F020, F021, F022, F023, F026, and F027 (264.343(a)(2))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	0	0.00	\$0.00
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Monitoring and inspections (264.347(b) and (c))</b>											
Conduct thorough visual inspections, at least daily, of the incinerator and associated equipment	0.00	0.00	1.50	0.00	1.50	\$58.25		\$0.00	39	58.50	\$2,271.56
Conduct operational testing, at least weekly, of the emergency waste feed cutoff system and associated alarms	0.00	0.00	1.50	0.00	1.50	\$58.25		\$0.00	39	58.50	\$2,271.56
Prepare exemption demonstration (264.347(c))	0.00	0.00	208.00	0.00	208.00	\$8,076.64	\$0.00	\$0.00	1	208.00	\$8,076.64
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	1	0.50	\$14.37
If the demonstration is approved, inspect the emergency waste feed cutoff system and associated alarms on a monthly basis	0.00	0.00	0.25	0.00	0.25	\$9.71	\$0.00	\$0.00	1	0.25	\$9.71
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	325.75	\$12,643.83
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	325.75	\$12,643.83

<b>EXHIBIT 7b</b>											
<b>INCINERATORS - INTERIM STATUS</b>											
<b>ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES</b>											
<b>INFORMATION COLLECTION</b>	<b>Legal</b>	<b>Managerial</b>	<b>Technical</b>	<b>Clerical</b>	<b>Respon.</b>	<b>Labor</b>	<b>Capital/</b>	<b>O&amp;M</b>	<b>Number</b>	<b>Total</b>	<b>Total</b>
<b>ACTIVITY</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours/</b>	<b>Cost/</b>	<b>Startup</b>	<b>Cost</b>	<b>of Res-</b>	<b>Hours/</b>	<b>Cost/</b>
					<b>Year</b>	<b>Year</b>	<b>Cost</b>	<b>Cost</b>	<b>pondents</b>	<b>Year</b>	<b>Year</b>
<b>Incinerators - Interim Status</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00
<b>Applicability (265.340(b))</b>											
Determine whether waste meets the requirements and document the fact in writing	0.00	0.50	8.00	0.50	9.00	\$310.89	\$0.00	\$0.00	0	0.00	\$0.00
File documentation at the facility	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00
<b>Waste analysis (265.341)</b>											
Conduct waste analysis	0.00	0.00	5.00	0.00	5.00	\$169.80	\$0.00	\$750.00	0	0.00	\$0.00
<b>Monitoring and inspections (265.347(b))</b>											
Inspect the complete incinerator and associated equipment, at least daily	0.00	0.00	1.50	0.00	1.50	\$50.94	\$0.00	\$0.00	0	0.00	\$0.00
Inspect all emergency shutdown controls and system alarms	0.00	0.00	1.50	0.00	1.50	\$50.94	\$0.00	\$0.00	0	0.00	\$0.00
<b>Special requirements for hazardous wastes F020, F021, F022, F023, F026, and F027 (265.352(b)(1))</b>											
Complete the application demonstrating that the incinerator can meet performance standards	0.00	25.00	200.00	25.00	250.00	\$8,752.25	\$0.00	\$100,000.00	0	0.00	\$0.00
Submit the application	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>EXHIBIT 7b (CONTINUED)</b>											
<b>INCINERATORS - PERMITTED</b>											
<b>ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES</b>											
<b>INFORMATION COLLECTION</b>	<b>Legal</b>	<b>Managerial</b>	<b>Technical</b>	<b>Clerical</b>	<b>Respon.</b>	<b>Labor</b>	<b>Capital/</b>	<b>O&amp;M</b>	<b>Number</b>	<b>Total</b>	<b>Total</b>
<b>ACTIVITY</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours</b>	<b>Hours/</b>	<b>Cost/</b>	<b>Startup</b>	<b>Cost</b>	<b>of Res-</b>	<b>Hours/</b>	<b>Cost/</b>
					<b>Year</b>	<b>Year</b>	<b>Cost</b>	<b>Cost</b>	<b>pondents</b>	<b>Year</b>	<b>Year</b>
<b>Incinerators - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00
<b>Notification of intent to burn hazardous wastes F020, F021, F022, F023, F026, and F027 (264.343(a)(2))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	0	0.00	\$0.00
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Monitoring and inspections (264.347(b) and (c))</b>											
Conduct thorough visual inspections, at least daily, of the incinerator and associated equipment	0.00	0.00	1.50	0.00	1.50	\$50.94	\$0.00	\$0.00	5	7.50	\$254.70
Conduct operational testing, at least weekly, of the emergency waste feed cutoff system and associated alarms	0.00	0.00	1.50	0.00	1.50	\$50.94	\$0.00	\$0.00	5	7.50	\$254.70
Prepare exemption demonstration (264.347(c))	0.00	0.00	208.00	0.00	208.00	\$7,063.68	\$0.00	\$0.00	1	208.00	\$7,063.68
Submit demonstration to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	1	0.50	\$13.83
If the demonstration is approved, inspect the emergency waste feed cutoff system and associated alarms on a monthly basis	0.00	0.00	0.25	0.00	0.25	\$8.49	\$0.00	\$0.00	1	0.25	\$8.49
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	223.75	\$7,595.40
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	223.75	\$7,595.40

EXHIBIT 8a DRIP PADS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Drip Pads</b>											
<b>Read the Regulations</b>											
Read the Regulations	0.00	0.00	1.50	0.00	1.50	\$58.25	\$0.00	\$0.00	0	0.00	\$0.00
<b>Contingency Plan (265.440(c)(1))</b>											
Develop and maintain a contingency plan for discharge of drippage, including documentation of drippage	0.00	0.00	2.00	0.50	2.50	\$89.03	\$0.00	\$0.00	0	0.00	\$0.00
<b>Assessment of Existing Drip Pad Integrity (265.441(a))</b>											
Obtain and submit a written certified assessment	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$340.00	0	0.00	\$0.00
Maintain written assessment	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	0	0.00	\$0.00
Review, update, and re-certify assessment annually	0.00	0.50	0.00	0.00	0.50	\$40.30	\$0.00	\$340.00	0	0.00	\$0.00
<b>Plan for Upgrading, Repairing, and Modifying the Drip Pad (265.441(b) and (c))</b>											
Develop and submit a written certified plan	0.00	1.00	8.00	0.00	9.00	\$391.23	\$0.00	\$1,500.00	0	0.00	\$0.00
Submit the plan	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
Obtain and submit as-built drawings and a certification	0.00	1.00	1.00	0.50	2.50	\$130.79	\$0.00	\$340.00	0	0.00	\$0.00
<b>Design and Operating Requirements (265.443(a)(4)(i), (b)(3), (g), (i), and (k))</b>											
Obtain and maintain a written certified assessment of a new drip pad	0.00	1.00	0.00	0.00	1.00	\$80.59	\$0.00	\$340.00	0	0.00	\$0.00
Update and maintain written certified assessment of drip pad annually	0.00	1.00	0.00	0.00	1.00	\$80.59	\$0.00	\$340.00	0	0.00	\$0.00
Maintain documentation of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner	0.00	0.00	1.00	4.00	5.00	\$129.79	\$0.00	\$0.00	0	0.00	\$0.00
Obtain and maintain a certification of compliance with §265.443 from an independent, qualified registered professional engineer	0.00	1.00	0.00	0.00	1.00	\$80.59	\$0.00	\$340.00	0	0.00	\$0.00
Maintain documentation of the date and time of cleaning of the drip pad	0.00	0.00	1.00	4.00	5.00	\$129.79	\$0.00	\$0.00	0	0.00	\$0.00
Maintain records of treated wood on pad	0.00	0.00	1.00	4.00	5.00	\$129.79	\$0.00	\$0.00	0	0.00	\$0.00
<b>Emergency Response (265.443(m))</b>											
Enter a record of discovery	0.00	0.00	1.00	0.00	1.00	\$38.83	\$0.00	\$0.00	0	0.00	\$0.00
Notify EPA of each condition within 24 hours	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	0	0.00	\$0.00
Provide written notification to EPA within 10 working days	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	0	0.00	\$0.00
Prepare and submit report and certification to EPA when all repairs and clean up are complete	0.00	1.00	7.50	1.50	10.00	\$405.93	\$0.00	\$340.00	0	0.00	\$0.00
<b>Facility Operating Record (265.443(n))</b>											
Maintain documentation of past operating and waste handling practices	0.00	2.00	6.00	0.00	8.00	\$394.16	\$0.00	\$0.00	0	0.00	\$0.00
<b>Inspections (265.444)</b>											
Inspect and certify liners immediately after construction or installation	0.00	0.00	4.33	0.00	4.33	\$168.13	\$0.00	\$340.00	0	0.00	\$0.00
Inspect and certify liners on a weekly basis	0.00	0.00	4.33	0.00	4.33	\$168.13	\$0.00	\$340.00	0	0.00	\$0.00
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 8b DRIP PADS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year	
<b>Drip Pads</b>												
<b>Read the Regulations</b>												
Read the Regulations	0.00	0.00	1.50	0.00	1.50	\$50.94	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Contingency Plan (265.440(c)(1))</b>												
Develop and maintain a contingency plan for discharge of drippage, including documentation of drippage	0.00	0.00	2.00	0.50	2.50	\$78.75	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Assessment of Existing Drip Pad Integrity (265.441(a))</b>												
Obtain and submit a written certified assessment	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$340.00	0	0.00	\$0.00	
Maintain written assessment	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00	
Review, update, and re-certify assessment annually	0.00	0.50	0.00	0.00	0.50	\$28.38	\$0.00	\$340.00	0	0.00	\$0.00	
<b>Plan for Upgrading, Repairing, and Modifying the Drip Pad (265.441(b) and (c))</b>												
Develop and submit a written certified plan	0.00	1.00	8.00	0.00	9.00	\$328.43	\$0.00	\$1,500.00	0	0.00	\$0.00	
Submit the plan	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00	
Obtain and submit as-built drawings and a certification	0.00	1.00	1.00	0.50	2.50	\$101.54	\$0.00	\$340.00	0	0.00	\$0.00	
<b>Design and Operating Requirements (265.443(a)(4)(i), (b)(3), (g), (i), and (k))</b>												
Obtain and maintain a written certified assessment of a new drip pad	0.00	1.00	0.00	0.00	1.00	\$56.75	\$0.00	\$340.00	0	0.00	\$0.00	
Update and maintain written certified assessment of drip pad annually	0.00	1.00	0.00	0.00	1.00	\$56.75	\$0.00	\$340.00	0	0.00	\$0.00	
Maintain documentation of the date and time of any leakage collected and removed from the leakage collection system immediately above the liner	0.00	0.00	1.00	4.00	5.00	\$120.60	\$0.00	\$0.00	0	0.00	\$0.00	
Obtain and maintain a certification of compliance with §265.443 from an independent, qualified registered professional engineer	0.00	1.00	0.00	0.00	1.00	\$56.75	\$0.00	\$340.00	0	0.00	\$0.00	
Maintain documentation of the date and time of cleaning of the drip pad	0.00	0.00	1.00	4.00	5.00	\$120.60	\$0.00	\$0.00	0	0.00	\$0.00	
Maintain records of treated wood on pad	0.00	0.00	1.00	4.00	5.00	\$120.60	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Emergency Response (265.443(m))</b>												
Enter a record of discovery	0.00	0.00	1.00	0.00	1.00	\$33.96	\$0.00	\$0.00	0	0.00	\$0.00	
Notify EPA of each condition within 24 hours	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	0	0.00	\$0.00	
Provide written notification to EPA within 10 working days	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	0	0.00	\$0.00	
Prepare and submit report and certification to EPA when all repairs and clean up are complete	0.00	1.00	7.50	1.50	10.00	\$343.94	\$0.00	\$340.00	0	0.00	\$0.00	
<b>Facility Operating Record (265.443(n))</b>												
Maintain documentation of past operating and waste handling practices	0.00	2.00	6.00	0.00	8.00	\$317.26	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Inspections (265.444)</b>												
Inspect and certify liners immediately after construction or installation	0.00	0.00	4.33	0.00	4.33	\$147.05	\$0.00	\$340.00	0	0.00	\$0.00	
Inspect and certify liners on a weekly basis	0.00	0.00	4.33	0.00	4.33	\$147.05	\$0.00	\$340.00	0	0.00	\$0.00	
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00	

EXHIBIT 9a MISCELLANEOUS UNITS - PERMITTED ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Miscellaneous Units - Permitted Facilities Only</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00



EXHIBIT 9b												
MISCELLANEOUS UNITS - PERMITTED												
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION	Legal	Managerial	Technical	Clerical	Respon.	Labor	Capital/	O&M		Number	Total	Total
ACTIVITY	Hours	Hours	Hours	Hours	Hours/	Cost/	Startup	Cost		of Res-	Hours/	Cost/
					Year	Year	Cost	Cost		pondents	Year	Year
Miscellaneous Units - Permitted Facilities Only												
Read the Regulations												
Read the regulations	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00		0	0.00	\$0.00
GRAND TOTAL	varies	varies	varies	varies	varies	varies	varies	varies		varies	0.00	\$0.00

EXHIBIT 10a PROCESS VENTS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Process Vents - Interim Status</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00
<b>Control Device Operation Documentation (265.1033(i))</b>											
Gather control device operation/process parameter information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00
Document control device/process parameter information	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	0	0.00	\$0.00
Reassess and file control device operation documentation	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
Modify control device operation documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
Maintain documentation at the facility (265.1035)(e)	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
<b>Waste Determination (265.1034(d)(2))</b>											
Gather production process, waste generation and specification analysis information (200 times annually)	0.00	400.00	2,800.00	400.00	3,600.00	\$150,056.00	\$0.00	\$40,000.00	2	7,200.00	\$380,112.00
Document production process, waste generation and specification analysis information (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,274.00	\$0.00	\$0.00	2	200.00	\$4,548.00
Maintain documentation at the facility (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,274.00	\$0.00	\$0.00	2	200.00	\$4,548.00
<b>Facility operating record: Implementation schedule (265.1035(b)(1))</b>											
Prepare implementation schedule	0.00	1.00	6.00	1.00	8.00	\$336.31	\$0.00	\$0.00	0	0.00	\$0.00
Reassess implementation schedule	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain implementation schedule	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility operating record: Up-to-date documentation of compliance with 265.1032 (265.1035(b)(2))</b>											
Prepare documentation of compliance	0.00	1.00	6.00	1.00	8.00	\$336.31	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility operating record: Performance test plan (265.1035(b)(3))</b>											
Prepare performance test plan	0.00	1.00	6.00	1.00	8.00	\$336.31	\$0.00	\$0.00	0	0.00	\$0.00
Reassess performance test plan	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility operating record: Documentation of compliance with 265.1033 (265.1035(b)(4))</b>											
Prepare documentation of compliance	0.00	1.00	6.00	1.00	8.00	\$336.31	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility operating record: Design/monitoring/operation/inspection information (265.1035(c))</b>											
Prepare design/monitoring/operation/inspection information	0.00	1.00	6.00	1.00	8.00	\$336.31	\$0.00	\$0.00	0	0.00	\$0.00
Reassess design/monitoring/operation/inspection information	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility operating record: Determination of applicability of 265.1032 (265.1035(f))</b>											
Prepare determination of applicability	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00
Reassess determination of applicability	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	18	36.00	\$1,397.88
File and maintain determination of applicability	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	18	9.00	\$204.66
Modify determination of applicability	0.00	0.00	3.00	1.00	4.00	\$139.23	\$0.00	\$0.00	5	20.00	\$696.15
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	8,055.00	\$405,781.53

EXHIBIT 10a (CONTINUED)												
PROCESS VENTS - PERMITTED												
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year	
<b>Process Vents - Permitted</b>												
<b>Read the Regulations</b>												
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Control Device Operation Documentation (264.1033(f))</b>												
Gather information	0.00	0.00	3.50	0.50	4.00	\$147.28	\$0.00	\$0.00	1	4.00	\$147.28	
Document information	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	1	2.00	\$77.66	
Reassess and file documentation	0.00	0.00	1.50	0.50	2.00	\$69.62	\$0.00	\$0.00	742	1,484.00	\$51,654.33	
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
Maintain documentation at the facility (264.1035)(e)(2)	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
<b>Waste Determination (264.1034(d)(2))</b>												
Gather information (200 times annually)	0.00	400.00	2,800.00	400.00	3,600.00	\$150,056.00	\$0.00	\$40,000.00	74	266,400.00	\$14,064,144.00	
Document information (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,274.00	\$0.00	\$0.00	74	7,400.00	\$168,276.00	
Maintain documentation at the facility (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,274.00	\$0.00	\$0.00	74	7,400.00	\$168,276.00	
<b>Facility operating record: Implementation schedule (264.1035(b)(1))</b>												
Prepare implementation schedule	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess implementation schedule	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain implementation schedule	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Facility operating record: Up-to-date documentation of compliance with 264.1032 (264.1035(b)(2))</b>												
Prepare documentation of compliance	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Facility operating record: Performance test plan (264.1035(b)(3))</b>												
Prepare performance test plan	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess performance test plan	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Facility operating record: Documentation of compliance with 264.1033 (264.1035(b)(4))</b>												
Prepare documentation of compliance	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Facility operating record: Design/monitoring/operation/inspection information (264.1035(c))</b>												
Prepare design/monitoring/operation/inspection information	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess design/monitoring/operation/inspection information	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Facility operating record: Determination of applicability of 264.1032 (264.1035(f))</b>												
Prepare determination of applicability	0.00	0.00	7.00	1.00	8.00	\$294.55	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess determination of applicability	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	742	1,484.00	\$57,623.72	
File and maintain determination of applicability	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	742	371.00	\$8,436.54	
Modify determination of applicability	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	74	296.00	\$11,493.68	
<b>Semiannual Report of Control Device Monitoring Events (264.1036)</b>												
Prepare the semiannual report	0.00	4.00	6.00	6.00	16.00	\$691.78	\$0.00	\$0.00	445	7,120.00	\$307,842.10	
Submit semiannual report to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	445	222.50	\$6,394.65	
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	303,605.50	\$15,252,065.88	
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	311,660.50	\$15,657,847.41	

EXHIBIT 10b PROCESS VENTS - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Process Vents - Interim Status</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00
<b>Control Device Operation Documentation (265.1033(f))</b>											
Gather control device operation/process parameter information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00
Document control device/process parameter information	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00
Reassess and file control device operation documentation	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
Modify control device operation documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
Maintain documentation at the facility (265.1035)(e)	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
<b>Waste Determination (265.1034(d)(2))</b>											
Gather production process, waste generation and specification analysis information (200 times annually)	0.00	400.00	2,800.00	400.00	3,600.00	\$126,452.00	\$0.00	\$40,000.00	0	0.00	\$0.00
Document production process, waste generation and specification analysis information (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,166.00	\$0.00	\$0.00	0	0.00	\$0.00
Maintain documentation at the facility (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,166.00	\$0.00	\$0.00	0	0.00	\$0.00
<b>Facility operating record: Implementation schedule (265.1035(b)(1))</b>											
Prepare implementation schedule	0.00	1.00	6.00	1.00	8.00	\$282.17	\$0.00	\$0.00	0	0.00	\$0.00
Reassess implementation schedule	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain implementation schedule	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility operating record: Up-to-date documentation of compliance with 265.1032 (265.1035(b)(2))</b>											
Prepare documentation of compliance	0.00	1.00	6.00	1.00	8.00	\$282.17	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility operating record: Performance test plan (265.1035(b)(3))</b>											
Prepare performance test plan	0.00	1.00	6.00	1.00	8.00	\$282.17	\$0.00	\$0.00	0	0.00	\$0.00
Reassess performance test plan	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility operating record: Documentation of compliance with 265.1033 (265.1035(b)(4))</b>											
Prepare documentation of compliance	0.00	1.00	6.00	1.00	8.00	\$282.17	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility operating record: Design/monitoring/operation/inspection information (265.1035(c))</b>											
Prepare design/monitoring/operation/inspection information	0.00	1.00	6.00	1.00	8.00	\$282.17	\$0.00	\$0.00	0	0.00	\$0.00
Reassess design/monitoring/operation/inspection information	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility operating record: Determination of applicability of 265.1032 (265.1035(f))</b>											
Prepare determination of applicability	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess determination of applicability	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76
File and maintain determination of applicability	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49
Modify determination of applicability	0.00	0.00	3.00	1.00	4.00	\$123.54	\$0.00	\$0.00	1	4.00	\$123.54
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	80.50	\$2,592.33

EXHIBIT 10b (CONTINUED)											
PROCESS VENTS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Process Vents - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00
<b>Control Device Operation Documentation (264.1033(f))</b>											
Gather information	0.00	0.00	3.50	0.50	4.00	\$129.69	\$0.00	\$0.00	1	4.00	\$129.69
Document information	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	1	2.00	\$67.92
Reassess and file documentation	0.00	0.00	1.50	0.50	2.00	\$61.77	\$0.00	\$0.00	80	160.00	\$4,941.60
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
Maintain documentation at the facility (264.1035)(e)(2)	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
<b>Waste Determination (264.1034(d)(2))</b>											
Gather information (200 times annually)	0.00	400.00	2,800.00	400.00	3,600.00	\$126,452.00	\$0.00	\$40,000.00	8	28,800.00	\$1,331,616.00
Document information (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,166.00	\$0.00	\$0.00	8	800.00	\$17,328.00
Maintain documentation at the facility (200 times annually)	0.00	0.00	0.00	100.00	100.00	\$2,166.00	\$0.00	\$0.00	8	800.00	\$17,328.00
<b>Facility operating record: Implementation schedule (264.1035(b)(1))</b>											
Prepare implementation schedule	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess implementation schedule	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain implementation schedule	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Facility operating record: Up-to-date documentation of compliance with 264.1032 (264.1035(b)(2))</b>											
Prepare documentation of compliance	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Facility operating record: Performance test plan (264.1035(b)(3))</b>											
Prepare performance test plan	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess performance test plan	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Facility operating record: Documentation of compliance with 264.1033 (264.1035(b)(4))</b>											
Prepare documentation of compliance	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation of compliance	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain documentation of compliance	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify documentation of compliance	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Facility operating record: Design/monitoring/operation/inspection information (264.1035(c))</b>											
Prepare design/monitoring/operation/inspection information	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess design/monitoring/operation/inspection information	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Facility operating record: Determination of applicability of 264.1032 (264.1035(f))</b>											
Prepare determination of applicability	0.00	0.00	7.00	1.00	8.00	\$259.38	\$0.00	\$0.00	0	0.00	\$0.00
Reassess determination of applicability	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	80	160.00	\$5,433.60
File and maintain determination of applicability	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	80	40.00	\$866.40
Modify determination of applicability	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	8	32.00	\$1,086.72
<b>Semiannual Report of Control Device Monitoring Events (264.1036)</b>											
Prepare the semiannual report	0.00	4.00	6.00	6.00	16.00	\$560.72	\$0.00	\$0.00	48	768.00	\$26,914.56
Submit semiannual report to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	48	24.00	\$663.84
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	32,822.00	\$1,445,263.05
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	32,902.50	\$1,447,855.38

EXHIBIT 11a EQUIPMENT LEAKS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Equipment Leaks - Interim Status</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00
<b>Notification to implement the alternative valve standard in 265.1061(a) (265.1061(b)(1))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	7	10.50	\$452.64
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	7	3.50	\$100.59
<b>Notification to discontinue alternative valve standard in 265.1061(a) (265.1061(d))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	0	0.00	\$0.00
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	0	0.00	\$0.00
<b>Notification to implement the alternative valve standard in 265.1062(b)(2) and (3) (265.1062(a)(2))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	2	3.00	\$129.33
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	2	1.00	\$28.74
<b>Non-hazardous waste documentation (265.1063(d)(3))</b>											
Gather production process, waste generation, and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$621.28	\$0.00	\$800.00	4	64.00	\$5,685.12
Document production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$621.28	\$0.00	\$0.00	4	64.00	\$2,485.12
Maintain documentation at the facility (4 times annually)	0.00	0.00	0.00	2.00	2.00	\$45.48	\$0.00	\$0.00	4	8.00	\$181.92
<b>Facility operating record: Equipment record (265.1064(b)(1))</b>											
Prepare equipment record	0.00	0.00	6.00	1.00	7.00	\$255.72	\$0.00	\$0.00	0	0.00	\$0.00
Reassess equipment record	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	35	70.00	\$2,718.10
File and maintain equipment record	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95
Modify equipment record	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52
<b>Facility operating record: Implementation schedule (265.1064(b)(2))</b>											
Prepare implementation schedule	0.00	0.50	2.00	0.50	3.00	\$129.33	\$0.00	\$0.00	0	0.00	\$0.00
Reassess implementation schedule	0.00	0.00	1.00	0.00	1.00	\$38.83	\$0.00	\$0.00	35	35.00	\$1,359.05
File and maintain schedule	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52
<b>Facility operating record: Performance test plan (265.1064(b)(3))</b>											
Prepare performance test plan	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00
Reassess performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	4	16.00	\$621.28
File and maintain plan	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	4	2.00	\$45.48
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1	4.00	\$155.32
<b>Facility operating record: Documentation of compliance with 265.1060 (265.1064(b)(4))</b>											
Prepare documentation	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	35	140.00	\$5,436.20
File and maintain documentation	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52
<b>Facility operating record: Leak inspection log (265.1064(d))</b>											
Prepare a leak inspection log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	35	210.00	\$7,028.00
Reassess leak inspection log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	35	70.00	\$2,718.10
File and maintain leak inspection log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95
Modify leak inspection log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	35	140.00	\$5,436.20
<b>Facility operating record: Design/monitoring/operation/inspection information (265.1064(e))</b>											
Prepare design/monitoring/operation/inspection information	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00
Reassess design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	35	140.00	\$5,436.20
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52

EXHIBIT 11a (CONTINUED)												
EQUIPMENT LEAKS - INTERIM STATUS												
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year	
<b>Facility operating record: Monitoring and inspection information for other control devices (265.1064 (f))</b>												
Prepare monitoring and inspection information	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1	4.00	\$155.32	
File and maintain monitoring and inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1	0.50	\$11.37	
Modify monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1	4.00	\$155.32	
<b>Facility operating record: Equipment log (265.1064(g))</b>												
Prepare an equipment log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess equipment log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	35	70.00	\$2,718.10	
File and maintain an equipment log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95	
Modify equipment log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52	
<b>Facility operating record: Valve log for all valves subject to 265.1057(g) and (h) (265.1064(h))</b>												
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$278.46	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	9	18.00	\$698.94	
File and maintain log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	9	4.50	\$102.33	
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	3	12.00	\$465.96	
<b>Facility operating record: Valve log for all valves subject to 265.1062 (265.1064(i))</b>												
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$278.46	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	2	4.00	\$155.32	
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	2	1.00	\$22.74	
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1	4.00	\$155.32	
<b>Facility operating record: Criteria log (265.1064(j))</b>												
Prepare criteria log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess criteria log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	35	70.00	\$2,718.10	
File and maintain criteria log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95	
Modify criteria log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52	
<b>Facility operating record: Exemption log (265.1064(k))</b>												
Prepare exemption log	0.00	0.00	4.00	1.00	5.00	\$178.06	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess exemption log	0.00	0.00	1.00	0.00	1.00	\$38.83	\$0.00	\$0.00	35	35.00	\$1,359.05	
File and maintain exemption log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	35	17.50	\$397.95	
Modify exemption log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	11	44.00	\$1,708.52	
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,656.00	\$63,878.49	

EXHIBIT 11a (CONTINUED)												
EQUIPMENT LEAKS - PERMITTED												
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year	
<b>Equipment Leaks - Permitted</b>												
<b>Read the Regulations</b>												
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Notification to implement the alternative valve standard in 264.1061(a) (264.1061(b)(1))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	350	525.00	\$22,631.88	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	350	175.00	\$5,029.50	
<b>Notification to discontinue alternative valve standard in 264.1061(a) (264.1061(d))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	4	6.00	\$258.65	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	4	2.00	\$57.48	
<b>Notification to implement alternative valve standard (264.1062)(b)(2) and (3) (264.1062(a)(2))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$64.66	\$0.00	\$0.00	88	132.00	\$5,690.30	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	88	44.00	\$1,264.56	
<b>Non-hazardous waste documentation (264.1063(d)(3))</b>												
Gather production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$621.28	\$0.00	\$800.00	175	2,800.00	\$248,724.00	
Document production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$621.28	\$0.00	\$0.00	175	2,800.00	\$108,724.00	
Maintain documentation at the facility (4 times annually)	0.00	0.00	0.00	2.00	2.00	\$45.48	\$0.00	\$0.00	175	350.00	\$7,959.00	
<b>Facility Operating Record: Equipment record (264.1064(b)(1))</b>												
Prepare equipment record	0.00	0.00	6.00	1.00	7.00	\$255.72	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess equipment record	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	1,752	3,504.00	\$136,060.32	
File and maintain equipment record	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24	
Modify equipment record	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00	
<b>Facility Operating Record: Implementation schedule (264.1064(b)(2))</b>												
Prepare implementation schedule	0.00	0.50	2.00	0.50	3.00	\$129.33	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess implementation schedule	0.00	0.00	1.00	0.00	1.00	\$38.83	\$0.00	\$0.00	1,752	1,752.00	\$68,030.16	
File and maintain schedule	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24	
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00	
<b>Facility Operating Record: Performance test plan (264.1064(b)(3))</b>												
Prepare performance test plan	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	350	1,400.00	\$54,362.00	
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	350	175.00	\$3,979.50	
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	35	140.00	\$5,436.20	
<b>Facility Operating Record: Documentation of compliance with 264.1060 (264.1064(b)(4))</b>												
Prepare documentation	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1,752	7,008.00	\$272,120.64	
File and maintain documentation	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24	
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00	
<b>Facility Operating Record: Leak inspection log (264.1064(d))</b>												
Prepare a leak inspection log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	1,752	10,512.00	\$351,801.60	
Reassess leak inspection log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	1,752	3,504.00	\$136,060.32	
File and maintain leak inspection log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24	
Modify leak inspection log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1,752	7,008.00	\$272,120.64	
<b>Facility Operating Record: Design/monitoring/operation/inspection information (264.1064(e))</b>												
Prepare design/monitoring/operation/inspection information	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	11	209.00	\$8,220.85	
Reassess design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	1,752	7,008.00	\$272,120.64	
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24	
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00	



EXHIBIT 11a (CONTINUED)											
EQUIPMENT LEAKS - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Facility Operating Record: Monitoring and inspection information for other control devices (264.1064(f))</b>											
Prepare monitoring and inspection information	0.00	1.00	16.00	2.00	19.00	\$747.35	\$0.00	\$0.00	0	0.00	\$0.00
Reassess monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	17	68.00	\$2,640.44
File and maintain monitoring and inspection information	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	17	8.50	\$193.29
Modify monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	5	20.00	\$776.60
<b>Facility Operating Record: Equipment log (264.1064(g))</b>											
Prepare an equipment log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	0	0.00	\$0.00
Reassess equipment log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	1,752	3,504.00	\$136,060.32
File and maintain an equipment log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24
Modify equipment log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00
<b>Facility Operating Record: Valve log for all valves subject to 264.1057(g) and (h) (264.1064(h))</b>											
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$278.46	\$0.00	\$0.00	0	0.00	\$0.00
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	438	876.00	\$34,015.08
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	438	219.00	\$4,980.06
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	44	176.00	\$6,834.08
<b>Facility Operating Record: Valve log for all valves subject to 264.1062 (264.1064(i))</b>											
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$278.46	\$0.00	\$0.00	0	0.00	\$0.00
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	88	176.00	\$6,834.08
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	88	44.00	\$1,000.56
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	9	36.00	\$1,397.88
<b>Facility Operating Record: Criteria log (264.1064(j))</b>											
Prepare criteria log	0.00	0.00	4.00	2.00	6.00	\$200.80	\$0.00	\$0.00	0	0.00	\$0.00
Reassess criteria log	0.00	0.00	2.00	0.00	2.00	\$77.66	\$0.00	\$0.00	1,752	3,504.00	\$136,060.32
File and maintain criteria log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24
Modify criteria log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00
<b>Facility Operating Record: Exemption log (264.1064(k))</b>											
Prepare exemption log	0.00	0.00	4.00	1.00	5.00	\$178.06	\$0.00	\$0.00	0	0.00	\$0.00
Reassess exemption log	0.00	0.00	1.00	0.00	1.00	\$38.83	\$0.00	\$0.00	1,752	1,752.00	\$68,030.16
File and maintain exemption log	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$0.00	1,752	876.00	\$19,920.24
Modify exemption log	0.00	0.00	4.00	0.00	4.00	\$155.32	\$0.00	\$0.00	175	700.00	\$27,181.00
<b>Semiannual Report of Control Device Monitoring Events (264.1065)</b>											
Prepare semiannual report	0.00	1.00	6.00	2.00	9.00	\$359.05	\$0.00	\$0.00	1,051	9,459.00	\$377,361.55
Submit semiannual report to Region	0.00	0.00	0.00	0.50	0.50	\$11.37	\$0.00	\$3.00	1,051	525.50	\$15,102.87
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	81,330.00	\$3,121,568.45
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	82,986.00	\$3,185,446.94

EXHIBIT 11b EQUIPMENT LEAKS - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year	
<b>Equipment Leaks - Interim Status</b>												
<b>Read the Regulations</b>												
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Notification to implement the alternative valve standard in 265.1061(a) (265.1061(b)(1))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	1	1.50	\$53.56	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	1	0.50	\$13.83	
<b>Notification to discontinue alternative valve standard in 265.1061(a) (265.1061(d))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	0	0.00	\$0.00	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00	
<b>Notification to implement the alternative valve standard in 265.1062(b)(2) and (3) (265.1062(a)(2))</b>												
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	0	0.00	\$0.00	
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00	
<b>Non-hazardous waste documentation (265.1063(d)(3))</b>												
Gather production process, waste generation, and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$543.36	\$0.00	\$800.00	0	0.00	\$0.00	
Document production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$543.36	\$0.00	\$0.00	0	0.00	\$0.00	
Maintain documentation at the facility (4 times annually)	0.00	0.00	0.00	2.00	2.00	\$43.32	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Facility operating record: Equipment record (265.1064(b)(1))</b>												
Prepare equipment record	0.00	0.00	6.00	1.00	7.00	\$225.42	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess equipment record	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76	
File and maintain equipment record	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify equipment record	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Implementation schedule (265.1064(b)(2))</b>												
Prepare implementation schedule	0.00	0.50	2.00	0.50	3.00	\$107.13	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess implementation schedule	0.00	0.00	1.00	0.00	1.00	\$33.96	\$0.00	\$0.00	3	3.00	\$101.88	
File and maintain schedule	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Performance test plan (265.1064(b)(3))</b>												
Prepare performance test plan	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00	
File and maintain plan	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00	
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Facility operating record: Documentation of compliance with 265.1060 (265.1064(b)(4))</b>												
Prepare documentation	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	3	12.00	\$407.52	
File and maintain documentation	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Leak inspection log (265.1064(d))</b>												
Prepare a leak inspection log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	3	18.00	\$537.48	
Reassess leak inspection log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76	
File and maintain leak inspection log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify leak inspection log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	3	12.00	\$407.52	
<b>Facility operating record: Design/monitoring/operation/inspection information (265.1064(e))</b>												
Prepare design/monitoring/operation/inspection information	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	3	12.00	\$407.52	
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	



EXHIBIT 11b (CONTINUED)												
EQUIPMENT LEAKS - INTERIM STATUS												
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES												
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year	
<b>Facility operating record: Monitoring and inspection information for other control devices (265.1064 (f))</b>												
Prepare monitoring and inspection information	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
File and maintain monitoring and inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	1	0.50	\$10.83	
Modify monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Equipment log (265.1064(g))</b>												
Prepare an equipment log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess equipment log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76	
File and maintain an equipment log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify equipment log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Valve log for all valves subject to 265.1057(g) and (h) (265.1064(h))</b>												
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$247.08	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	1	2.00	\$67.92	
File and maintain log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	1	0.50	\$10.83	
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Facility operating record: Valve log for all valves subject to 265.1062 (265.1064(i))</b>												
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$247.08	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	0	0.00	\$0.00	
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	0	0.00	\$0.00	
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00	
<b>Facility operating record: Criteria log (265.1064(j))</b>												
Prepare criteria log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess criteria log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	3	6.00	\$203.76	
File and maintain criteria log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify criteria log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>Facility operating record: Exemption log (265.1064(k))</b>												
Prepare exemption log	0.00	0.00	4.00	1.00	5.00	\$157.50	\$0.00	\$0.00	0	0.00	\$0.00	
Reassess exemption log	0.00	0.00	1.00	0.00	1.00	\$33.96	\$0.00	\$0.00	3	3.00	\$101.88	
File and maintain exemption log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	3	1.50	\$32.49	
Modify exemption log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84	
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	137.00	\$4,418.29	

EXHIBIT 11b (CONTINUED)											
EQUIPMENT LEAKS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
<b>Equipment Leaks - Permitted</b>											
<b>Read the Regulations</b>											
Read the regulations	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	0	0.00	\$0.00
<b>Notification to implement the alternative valve standard in 264.1061(a) (264.1061(b)(1))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	25	37.50	\$1,339.06
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	25	12.50	\$345.75
<b>Notification to discontinue alternative valve standard in 264.1061(a) (264.1061(d))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	0	0.00	\$0.00
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	0	0.00	\$0.00
<b>Notification to implement alternative valve standard (264.1062(b)(2) and (3) (264.1062(a)(2))</b>											
Prepare notification	0.00	0.25	1.00	0.25	1.50	\$53.56	\$0.00	\$0.00	6	9.00	\$321.38
Submit notification to the Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	6	3.00	\$82.98
<b>Non-hazardous waste documentation (264.1063(d)(3))</b>											
Gather production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$543.36	\$0.00	\$800.00	13	208.00	\$17,463.68
Document production process, waste generation and specification analysis (4 times annually)	0.00	0.00	16.00	0.00	16.00	\$543.36	\$0.00	\$0.00	13	208.00	\$7,063.68
Maintain documentation at the facility (4 times annually)	0.00	0.00	0.00	2.00	2.00	\$43.32	\$0.00	\$0.00	13	26.00	\$563.16
<b>Facility Operating Record: Equipment record (264.1064(b)(1))</b>											
Prepare equipment record	0.00	0.00	6.00	1.00	7.00	\$225.42	\$0.00	\$0.00	0	0.00	\$0.00
Reassess equipment record	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	127	254.00	\$8,625.84
File and maintain equipment record	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify equipment record	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Facility Operating Record: Implementation schedule (264.1064(b)(2))</b>											
Prepare implementation schedule	0.00	0.50	2.00	0.50	3.00	\$107.13	\$0.00	\$0.00	0	0.00	\$0.00
Reassess implementation schedule	0.00	0.00	1.00	0.00	1.00	\$33.96	\$0.00	\$0.00	127	127.00	\$4,312.92
File and maintain schedule	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify implementation schedule	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Facility Operating Record: Performance test plan (264.1064(b)(3))</b>											
Prepare performance test plan	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00
Reassess performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	25	100.00	\$3,396.00
File and maintain performance test plan	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	25	12.50	\$270.75
Modify performance test plan	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	3	12.00	\$407.52
<b>Facility Operating Record: Documentation of compliance with 264.1060 (264.1064(b)(4))</b>											
Prepare documentation	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00
Reassess documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	127	508.00	\$17,251.68
File and maintain documentation	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify documentation	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Facility Operating Record: Leak inspection log (264.1064(d))</b>											
Prepare a leak inspection log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	127	762.00	\$22,753.32
Reassess leak inspection log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	127	254.00	\$8,625.84
File and maintain leak inspection log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify leak inspection log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	127	508.00	\$17,251.68
<b>Facility Operating Record: Design/monitoring/operation/inspection information (264.1064(e))</b>											
Prepare design/monitoring/operation/inspection information	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	11	209.00	\$7,077.73
Reassess design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	127	508.00	\$17,251.68
File and maintain design/monitoring/operation/inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify design/monitoring/operation/inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92

EXHIBIT 11b (CONTINUED)											
EQUIPMENT LEAKS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Facility operating record: Monitoring and inspection information for other control devices (264.1064 (f))</b>											
Prepare monitoring and inspection information	0.00	1.00	16.00	2.00	19.00	\$643.43	\$0.00	\$0.00	0	0.00	\$0.00
Reassess monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	17	68.00	\$2,309.28
File and maintain monitoring and inspection information	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	17	8.50	\$184.11
Modify monitoring and inspection information	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	5	20.00	\$679.20
<b>Facility Operating Record: Equipment log (264.1064(g))</b>											
Prepare an equipment log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	0	0.00	\$0.00
Reassess equipment log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	127	254.00	\$8,625.84
File and maintain an equipment log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify equipment log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Facility Operating Record: Valve log for all valves subject to 264.1057(g) and (h) (264.1064(h))</b>											
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$247.08	\$0.00	\$0.00	0	0.00	\$0.00
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	32	64.00	\$2,173.44
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	32	16.00	\$346.56
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	3	12.00	\$407.52
<b>Facility Operating Record: Valve log for all valves subject to 264.1062 (264.1064(i))</b>											
Prepare valve log	0.00	0.00	6.00	2.00	8.00	\$247.08	\$0.00	\$0.00	0	0.00	\$0.00
Reassess valve log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	6	12.00	\$407.52
File and maintain valve log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	6	3.00	\$64.98
Modify valve log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	1	4.00	\$135.84
<b>Facility Operating Record: Criteria log (264.1064(j))</b>											
Prepare criteria log	0.00	0.00	4.00	2.00	6.00	\$179.16	\$0.00	\$0.00	0	0.00	\$0.00
Reassess criteria log	0.00	0.00	2.00	0.00	2.00	\$67.92	\$0.00	\$0.00	127	254.00	\$8,625.84
File and maintain criteria log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify criteria log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Facility Operating Record: Exemption log (264.1064(k))</b>											
Prepare exemption log	0.00	0.00	4.00	1.00	5.00	\$157.50	\$0.00	\$0.00	0	0.00	\$0.00
Reassess exemption log	0.00	0.00	1.00	0.00	1.00	\$33.96	\$0.00	\$0.00	127	127.00	\$4,312.92
File and maintain exemption log	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$0.00	127	63.50	\$1,375.41
Modify exemption log	0.00	0.00	4.00	0.00	4.00	\$135.84	\$0.00	\$0.00	13	52.00	\$1,765.92
<b>Semiannual Report of Control Device Monitoring Events (264.1065)</b>											
Prepare semiannual report	0.00	1.00	6.00	2.00	9.00	\$303.83	\$0.00	\$0.00	76	684.00	\$23,091.08
Submit semiannual report to Region	0.00	0.00	0.00	0.50	0.50	\$10.83	\$0.00	\$3.00	76	38.00	\$1,051.08
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	6,195.00	\$210,184.58
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	6,332.00	\$214,602.87

EXHIBIT 12a CONTAINMENT BUILDINGS - INTERIM STATUS ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Containment Buildings - Interim Status</b>											
<b>Regulations</b>											
Read the Regulations	0.00	1.25	5.00	0.00	6.25	\$294.89	\$0.00	\$0.00	0	0.00	\$0.00
<b>Demonstration that unit meets the standards of Subpart DD (265.1101(b))</b>											
Demonstrate that the unit substantially meets standards of Subpart DD, if the owner or operator wants the secondary containment requirement to be delayed	1.00	1.00	16.00	0.50	18.50	\$826.60	\$0.00	\$3.00	0	0.00	\$0.00
<b>Certification and Response Procedures (265.1101(c))</b>											
Obtain and place a professional engineer certification into the facility's operating record	0.00	0.00	4.00	0.25	4.25	\$161.01	\$0.00	\$340.00	0	0.00	\$0.00
Upon detecting a condition that has caused a release of hazardous waste:						\$0.00					
Enter a record of the discovery in the facility operating record	0.00	0.25	0.50	0.00	0.75	\$39.56	\$0.00	\$0.00	0	0.00	\$0.00
Establish a schedule of accomplishing the cleanup and repairs	0.00	0.25	0.50	0.00	0.75	\$39.56	\$0.00	\$0.00	0	0.00	\$0.00
Notify EPA of the condition within 7 days of discovery of the condition	0.00	0.00	0.50	0.00	0.50	\$19.42	\$0.00	\$3.00	0	0.00	\$0.00
Provide within 14 days written notice and schedule for cleanup to EPA	0.00	0.00	0.50	0.25	0.75	\$25.10	\$0.00	\$3.00	0	0.00	\$0.00
Notify EPA and verify in writing that cleanup and repairs have been completed	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	0	0.00	\$0.00
Inspect and record in the facility's operating record, at least once every 7 days, data specified in (265.1101)	0.00	0.00	26.00	0.00	26.00	\$1,009.58	\$0.00	\$0.00	0	0.00	\$0.00
<b>Operating Procedures for Areas without Secondary Containment (265.110(d)(3))</b>											
Maintain in the facility log a written description of operating procedures used to maintain the integrity of areas without secondary containment	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$0.00	0	0.00	\$0.00
<b>Demonstration for Exemption from Secondary Containment Requirements (265.1101(e))</b>											
Demonstrate that the only free liquids in the unit are limited amounts of dust suppression liquids, if the owner/operator wants a waiver from the secondary containment requirements	1.00	1.00	2.00	0.50	4.50	\$282.98	\$0.00	\$1,500.00	0	0.00	\$0.00
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 12a (CONTINUED)											
CONTAINMENT BUILDINGS - PERMITTED											
ANNUAL PRIVATE RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours Per Year	Total Cost Per Year
<b>Containment Buildings - Permitted</b>											
<b>Regulations</b>											
Read the Regulations	0.00	1.25	5.00	0.00	6.25	\$294.89	\$0.00	\$0.00	0	0.00	\$0.00
<b>Demonstration that unit meets the standards of Subpart DD (264.1101(b))</b>											
Demonstrate that the unit substantially meets standards of Subpart DD, if the owner or operator wants the secondary containment requirement to be delayed	1.00	1.00	16.00	0.50	18.50	\$826.60	\$0.00	\$3.00	0	0.00	\$0.00
<b>Certification and Response Procedures (264.1101(c))</b>											
Obtain and place a professional engineer certification into the facility's operating record	0.00	0.00	4.00	0.25	4.25	\$161.01	\$0.00	\$340.00	4	17.00	\$2,004.02
Upon detecting a condition that has caused a release of hazardous waste:						\$0.00					
Enter a record of the discovery in the facility operating record	0.00	0.00	0.50	0.00	0.50	\$19.42	\$0.00	\$0.00	7	3.50	\$135.91
Establish a schedule of accomplishing the cleanup and repairs	0.00	0.25	0.50	0.00	0.75	\$39.56	\$0.00	\$0.00	7	5.25	\$276.94
Notify EPA of the condition within 7 days of discovery of the condition	0.00	0.00	0.50	0.00	0.50	\$19.42	\$0.00	\$3.00	7	3.50	\$156.91
Provide within 14 days written notice and schedule for cleanup to EPA	0.00	0.00	0.50	0.25	0.75	\$25.10	\$0.00	\$3.00	7	5.25	\$196.70
Notify EPA and verify in writing that cleanup and repairs have been completed	0.00	0.50	0.00	0.25	0.75	\$45.98	\$0.00	\$3.00	7	5.25	\$342.86
Inspect and record in the facility's operating record, at least once every 7 days, data specified in (264.1101)	0.00	0.00	26.00	0.00	26.00	\$1,009.58	\$0.00	\$0.00	26	676.00	\$26,249.08
<b>Recordkeeping Requirement (264.1101(d)(3))</b>											
Maintain in the facility log a written description of operating procedures used to maintain the integrity of areas without secondary containment	0.00	0.00	1.00	0.25	1.25	\$44.52	\$0.00	\$0.00	13	16.25	\$578.70
<b>Exemption Demonstration (264.1101(e))</b>											
Demonstrate that the only free liquids in the unit are limited amounts wants a waiver of dust suppression liquids, if the owner/operator from the secondary containment requirements	1.00	1.00	2.00	0.50	4.50	\$282.98	\$0.00	\$1,500.00	13	58.50	\$23,178.74
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	790.50	\$53,119.84
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	790.50	\$53,119.84



EXHIBIT 12b CONTAINMENT BUILDINGS - INTERIM STATUS ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost	Number of Res- pondents	Total Hours/ Year	Total Cost/ Year
<b>Containment Buildings - Interim Status</b>											
<b>Regulations</b>											
Read the Regulations	0.00	1.25	5.00	0.00	6.25	\$240.74	\$0.00	\$0.00	0	0.00	\$0.00
<b>Demonstration that unit meets the standards of Subpart DD (265.1101(b))</b>											
Demonstrate that the unit substantially meets standards of Subpart DD, if the owner or operator wants the secondary containment requirement to be delayed	1.00	1.00	16.00	0.50	18.50	\$671.39	\$0.00	\$3.00	0	0.00	\$0.00
<b>Certification and Response Procedures (265.1101(c))</b>											
Obtain and place a professional engineer certification into the facility's operating record	0.00	0.00	4.00	0.25	4.25	\$141.26	\$0.00	\$340.00	0	0.00	\$0.00
Upon detecting a condition that has caused a release of hazardous waste:						\$0.00					
Enter a record of the discovery in the facility operating record	0.00	0.25	0.50	0.00	0.75	\$31.17	\$0.00	\$0.00	1	0.75	\$31.17
Establish a schedule of accomplishing the cleanup and repairs	0.00	0.25	0.50	0.00	0.75	\$31.17	\$0.00	\$0.00	1	0.75	\$31.17
Notify EPA of the condition within 7 days of discovery of the condition	0.00	0.00	0.50	0.00	0.50	\$16.98	\$0.00	\$3.00	1	0.50	\$19.98
Provide within 14 days written notice and schedule for cleanup to EPA	0.00	0.00	0.50	0.25	0.75	\$22.40	\$0.00	\$3.00	1	0.75	\$25.40
Notify EPA and verify in writing that cleanup and repairs have been completed	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	1	0.75	\$36.79
Inspect and record in the facility's operating record, at least once every 7 days, data specified in (265.1101)	0.00	0.00	26.00	0.00	26.00	\$882.96	\$0.00	\$0.00	2	52.00	\$1,765.92
<b>Operating Procedures for Areas without Secondary Containment (265.110(d)(3))</b>											
Maintain in the facility log a written description of operating procedures used to maintain the integrity of areas without secondary containment	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$0.00	1	1.25	\$39.38
<b>Demonstration for Exemption from Secondary Containment Requirements (265.1101(e))</b>											
Demonstrate that the only free liquids in the unit are limited amounts of dust suppression liquids, if the owner/operator wants a waiver from the secondary containment requirements	1.00	1.00	2.00	0.50	4.50	\$195.95	\$0.00	\$1,500.00	1	4.50	\$1,695.95
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	61.25	\$3,645.75



EXHIBIT 12b (CONTINUED)											
CONTAINMENT BUILDINGS - PERMITTED											
ANNUAL GOVERNMENTS RESPONDENT BURDEN/COST ESTIMATES											
INFORMATION COLLECTION ACTIVITY	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours/Year	Labor Cost/Year	Capital/Startup Cost	O&M Cost	Number of Respondents	Total Hours Per Year	Total Cost Per Year
<b>Containment Buildings - Permitted</b>											
<b>Regulations</b>											
Read the Regulations	0.00	1.25	5.00	0.00	6.25	\$240.74	\$0.00	\$0.00	0	0.00	\$0.00
<b>Demonstration that unit meets the standards of Subpart DD (264.1101(b))</b>											
Demonstrate that the unit substantially meets standards of Subpart DD, if the owner or operator wants the secondary containment requirement to be delayed	1.00	1.00	16.00	0.50	18.50	\$671.39	\$0.00	\$3.00	0	0.00	\$0.00
<b>Certification and Response Procedures (264.1101(c))</b>											
Obtain and place a professional engineer certification into the facility's operating record	0.00	0.00	4.00	0.25	4.25	\$141.26	\$0.00	\$340.00	4	17.00	\$1,925.02
Upon detecting a condition that has caused a release of hazardous waste:						\$0.00					
Enter a record of the discovery in the facility operating record	0.00	0.00	0.50	0.00	0.50	\$16.98	\$0.00	\$0.00	1	0.50	\$16.98
Establish a schedule of accomplishing the cleanup and repairs	0.00	0.25	0.50	0.00	0.75	\$31.17	\$0.00	\$0.00	1	0.75	\$31.17
Notify EPA of the condition within 7 days of discovery of the condition	0.00	0.00	0.50	0.00	0.50	\$16.98	\$0.00	\$3.00	1	0.50	\$19.98
Provide within 14 days written notice and schedule for cleanup to EPA	0.00	0.00	0.50	0.25	0.75	\$22.40	\$0.00	\$3.00	1	0.75	\$25.40
Notify EPA and verify in writing that cleanup and repairs have been completed	0.00	0.50	0.00	0.25	0.75	\$33.79	\$0.00	\$3.00	1	0.75	\$36.79
Inspect and record in the facility's operating record, at least once every 7 days, data specified in (264.1101)	0.00	0.00	26.00	0.00	26.00	\$882.96	\$0.00	\$0.00	3	78.00	\$2,648.88
<b>Recordkeeping Requirement (264.1101(d)(3))</b>											
Maintain in the facility log a written description of operating procedures used to maintain the integrity of areas without secondary containment	0.00	0.00	1.00	0.25	1.25	\$39.38	\$0.00	\$0.00	2	2.50	\$78.75
<b>Exemption Demonstration (264.1101(e))</b>											
Demonstrate that the only free liquids in the unit are limited amounts wants a waiver of dust suppression liquids, if the owner/operator from the secondary containment requirements	1.00	1.00	2.00	0.50	4.50	\$195.95	\$0.00	\$1,500.00	2	9.00	\$3,391.90
<b>SUBTOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	109.75	\$8,174.86
<b>GRAND TOTAL</b>	varies	varies	varies	varies	varies	varies	varies	varies	varies	171.00	\$11,820.61

<b>EXHIBIT 13a</b>					
<b>TOTAL ANNUAL PRIVATE RESPONDENT BURDEN AND COST</b>					
	Total Hours per Year	Total Capital Cost per Year	Total O&M Cost per Year	Total Labor Cost per Year	Total Cost per Year
SUBPART I CONTAINERS	74,961	\$0	\$0	\$1,762,300	\$1,762,300
SUBPART J TANK SYSTEMS	58,965	\$0	\$122,111	\$2,289,316	\$2,411,427
SUBPART K SURFACE IMPOUNDMENTS	2,063	\$0	\$1,020	\$80,071	\$81,091
SUBPART L WASTE PILES	68	\$0	\$0	\$2,383	\$2,383
SUBPART M LAND TREATMENT	0.00	\$0	\$0	\$0	\$0
SUBPART N LANDFILLS	1,554	\$0	\$0	\$54,035	\$54,035
SUBPART O INCINERATORS	326	\$0	\$3	\$12,641	\$12,644
SUBPART X MISCELLANEOUS UNITS	0	\$0	\$0	\$0	\$0
SUBPART W DRIP PADS	0	\$0	\$0	\$0	\$0
SUBPART AA PROCESS VENTS	311,661	\$0	\$3,041,335	\$12,616,512	\$15,657,847
SUBPART BB EQUIPMENT LEAKS	82,986	\$0	\$147,706	\$3,037,741	\$3,185,447
SUBPART DD CONTAINMENT BUILDINGS	791	\$0	\$20,923	\$32,197	\$53,120
PURCHASE OF FILE CABINETS	0	\$0	0	0	0
<b>TOTAL PRIVATE RESPONDENT BURDEN PER YEAR</b>	<b>533,373</b>	<b>\$</b>	<b>\$ 3,333,098</b>	<b>\$ 19,887,195</b>	<b>\$ 23,220,293</b>

**EXHIBIT 13b****TOTAL ANNUAL NON-FEDERAL GOVERNMENTS RESPONDENT BURDEN AND COST**

	Total Hours per Year	Total Capital Cost per Year	Total O&M Cost per Year	Total Labor Cost per Year	Total Cost per Year
SUBPART I CONTAINERS	74,961	\$0	\$0	\$413,633	\$413,633
SUBPART J TANK SYSTEMS	4,800	\$0	\$12,860	\$162,676	\$175,536
SUBPART K SURFACE IMPOUNDMENTS	166	\$0	\$0	\$5,643	\$5,643
SUBPART L WASTE PILES	51	\$0	\$0	\$1,584	\$1,584
SUBPART M LAND TREATMENT	0.00	\$0	\$0	\$0	\$0
SUBPART N LANDFILLS	0	\$0	\$0	\$0	\$0
SUBPART O INCINERATORS	224	\$0	\$3	\$7,592	\$7,595
SUBPART X MISCELLANEOUS UNITS	0	\$0	\$0	\$0	\$0
SUBPART W DRIP PADS	0	\$0	\$0	\$0	\$0
SUBPART AA PROCESS VENTS	32,903	\$0	\$320,144	\$1,127,711	\$1,447,855
SUBPART BB EQUIPMENT LEAKS	6,332	\$0	\$10,724	\$203,879	\$214,603
SUBPART DD CONTAINMENT BUILDINGS	171	\$0	\$5,878	\$5,943	\$11,821
PURCHASE OF FILE CABINETS	0	\$0	0	0	0
<b>TOTAL GOVERNMENTS RESPONDENT BURDEN PER YEAR</b>	<b>119,608</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
			<b>349,609</b>	<b>1,928,661</b>	<b>2,278,270</b>

<b>EXHIBIT 14a ANNUAL EPA BURDEN AND COST</b>										
	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours Per Year</b>	<b>Labor Cost Per Year</b>	<b>O&amp;M Costs</b>	<b>Number of Respondent Activities</b>	<b>Total Hours Per Year</b>	<b>Total Cost Per Year</b>
<b>Tank Systems - Interim Status</b>										
Review equivalent containment device information	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.13	\$6.73
Review information submitted for exemption from 24-hour leak detection requirement	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review information submitted for variance from secondary containment requirements	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review information submitted for exemption from the 24-hour waste removal requirement	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.02	\$0.84
Review release notifications and reports	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review major repair certifications	0.00	0.00	8.00	0.00	8.00	\$407.82	\$0.00	0	0.00	\$0.00
Review decontamination demonstrations	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
<b>Tank Systems - Permitted</b>										
Review information submitted for exemption from the 24-hour waste removal requirement	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	6	25.20	\$1,284.64
Review release notifications and reports	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	38	153.60	\$7,830.18
Review major repair certifications	0.00	0.00	8.00	0.00	8.00	\$407.82	\$0.00	0	1.60	\$81.56
Review decontamination demonstrations	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
<b>Surface Impoundments - Interim Status</b>										
Review assessments of alternate design and operating practices	0.00	0.00	16.00	0.00	16.00	\$815.64	\$0.00	0	0.00	\$0.00
Review notifications of intent to receive waste	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$509.78	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$1,019.55	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.17	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review and establish pump operating levels	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
Review contingent corrective measures plan	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review hazardous waste removal plan	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
Review extension request	0.00	0.00	0.50	0.00	0.50	\$25.49	\$0.00	0	0.00	\$0.00
Review corrective action report (2 times annually)	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
<b>Surface Impoundments - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review notification of surface impoundment removal from service	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.00	\$0.00
Review contingent corrective measures plan	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review hazardous waste removal plan	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
Review extension request	0.00	0.00	0.50	0.00	0.50	\$25.49	\$0.00	0	0.00	\$0.00
Review corrective action report (2 times annually)	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
<b>Waste Piles - Interim Status</b>										
Review exemptions from design and operating requirements	0.00	0.00	7.00	0.00	7.00	\$356.84	\$0.00	0	0.00	\$0.00
Review exemptions from liner/leachate system requirements	0.00	0.00	7.00	0.00	7.00	\$356.84	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$509.78	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$1,019.55	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.17	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
<b>Waste Piles - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00

<b>EXHIBIT 14a (CONTINUED)</b>										
<b>ANNUAL EPA BURDEN AND COST</b>										
	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours Per Year</b>	<b>Labor Cost Per Year</b>	<b>O&amp;M Costs</b>	<b>Number of Respondent Activities</b>	<b>Total Hours Per Year</b>	<b>Total Cost Per Year</b>
<b>Land-Treatment - Interim Status</b>										
Review food-chain crop notifications	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
Review certifications of closure	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
<b>Land Treatment - Permitted</b>										
Review notifications of significant releases of hazardous constituents below the treatment zone	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
Review notifications of intent to demonstrate that regulated unit is not the source of increase in hazardous constituents	0.00	0.00	1.00	0.00	0.00	0.00	\$50.98	\$0.00	0	\$0.00
Review demonstrations that regulated unit is not the source of increase in hazardous constituents below the treatment zone	0.00	0.00	16.00	0.00	16.00	\$815.64	\$0.00	0	0.00	\$0.00
Review (264.280)(d) demonstrations	0.00	0.00	8.00	0.00	8.00	\$407.82	\$0.00	0	0.00	\$0.00
Review closure certifications	0.00	1.00	4.00	0.00	5.00	\$274.78	\$0.00	0	0.00	\$0.00
<b>Landfills - Interim Status</b>										
Review notifications of intent to receive waste	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
Review demonstrations for exemption from liner and leachate collection system requirements	0.00	0.00	16.00	0.00	16.00	\$815.64	\$0.00	0	0.00	\$0.00
Review information for waivers of the double liner requirements	0.00	0.00	4.00	0.00	4.00	\$203.91	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$509.78	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$1,019.55	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.17	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review and establish pump operating levels	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
Review demonstrations for placing non-hazardous liquid waste in landfills	0.00	0.00	7.00	0.00	7.00	\$356.84	\$0.00	0	0.00	\$0.00
<b>Landfills - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$213.86	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$545.21	\$0.00	0	0.00	\$0.00
Review demonstrations for placing non-hazardous liquid waste in landfills	0.00	0.00	7.00	0.00	7.00	\$356.84	\$0.00	0	0.00	\$0.00
<b>Incinerators - Interim Status</b>										
Review applications for certification to burn F020, F021, F022, F023, F026, and F027	0.00	0.50	20.00	0.00	20.50	\$1,054.99	\$0.00	0	0.00	\$0.00
<b>Incinerators - Permitted</b>										
Review notifications of intent to burn hazardous wastes F020, F021, F022, F023, F026, and F027	0.00	0.25	1.00	0.00	1.25	\$68.70	\$0.00	0	0.00	\$0.00
Review demonstrations for exemption from emergency waste feed cutoff system testing requirements (264.347(c))	0.00	0.00	16.00	0.00	16.00	\$815.64	\$0.00	0	1.60	\$81.56
<b>Misc Units -Interim Status and Permitted</b>										
Covered in other ICRs	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
<b>Drip Pads</b>										
Review plan for updating, repairing, and modifying the drip pad	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.00	\$0.00
Review release notifications and reports	0.00	0.00	1.00	0.00	1.00	\$50.98	\$0.00	0	0.00	\$0.00
<b>Process Vents - Permitted</b>										
Review semiannual reports	0.00	0.00	8.00	0.00	8.00	\$407.82	\$0.00	45	356.00	\$18,148.07

<b>EXHIBIT 14a (CONTINUED)</b>										
<b>ANNUAL EPA BURDEN AND COST</b>										
	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours Per Year</b>	<b>Labor Cost Per Year</b>	<b>O&amp;M Costs</b>	<b>Number of Respondent Activities</b>	<b>Total Hours Per Year</b>	<b>Total Cost Per Year</b>
<b>Equipment Leaks - Interim Status</b>										
Review notifications to implement the alternative valve standard in (265.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	1	1.40	\$71.37
Review notifications to discontinue alternative valve standard in (265.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.00	\$0.00
Review notifications to implement alternative valve standard in (265.1062)(b)(2) or (265.1062)(b)(3)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.40	\$20.39
<b>Equipment Leaks - Permitted</b>										
Review notifications to implement the alternative valve standard in (264.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	35	70.00	\$3,568.44
Review notifications to discontinue alternative valve standard in (264.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.80	\$40.78
Review notifications to implement alternative valve standard in (264.1062)(b)(2) or (264.1062)(b)(3)	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	9	17.60	\$897.21
Review semiannual reports	0.00	0.00	8.00	0.00	8.00	\$407.82	\$0.00	105	840.80	\$42,862.08
<b>Containment Buildings - Interim Status</b>										
Collect written notice of request for delay of secondary containment	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	0	0.00	\$0.00
Review and comment on plans to retrofit unit	0.00	0.50	4.00	0.50	5.00	\$250.21	\$0.00	0	0.00	\$0.00
Review response to comments and approve/disapprove delay	0.00	0.25	2.00	0.25	2.50	\$125.11	\$0.00	0	0.00	\$0.00
Receive notification of release	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	0	0.00	\$0.00
Review written notice, description or remedial steps, and schedule for cleanup	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	0	0.00	\$0.00
Review information and determine if unit must be removed from service	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	0	0.00	\$0.00
Notify owner/ operator in writing of determination	0.00	0.00	0.50	0.25	0.75	\$30.92	\$0.00	0	0.00	\$0.00
Review verification of cleanup	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	0	0.00	\$0.00
Review demonstration that free liquids are for dust suppression and approve or disapprove waiver	0.00	0.25	1.00	0.25	1.50	\$74.13	\$0.00	0	0.00	\$0.00
<b>Containment Buildings - Permitted</b>										
Collect written notice of request for delay of secondary containment	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	0	0.00	\$0.00
Review and comment on plans to retrofit unit	0.00	0.00	4.00	0.50	4.50	\$214.78	\$0.00	1	3.15	\$150.34
Review response to comments and approve/disapprove delay	0.00	0.50	2.00	0.25	2.75	\$142.82	\$0.00	1	1.93	\$99.98
Receive notification of release	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	1	0.18	\$8.92
Review written notice, description or remedial steps, and schedule for cleanup	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	1	0.18	\$8.92
Review information and determine if unit must be removed from service	0.00	0.00	2.00	0.00	2.00	\$101.96	\$0.00	1	1.40	\$71.37
Notify owner/ operator in writing of determination	0.00	0.00	0.50	0.25	0.75	\$30.92	\$0.00	1	0.53	\$21.65
Review verification of cleanup	0.00	0.00	0.25	0.00	0.25	\$12.74	\$0.00	1	0.18	\$8.92
Review demonstration that free liquids are for dust suppression and approve or disapprove waiver	0.00	0.25	1.00	0.25	1.50	\$74.13	\$0.00	1	1.95	\$96.37
<b>TOTAL</b>	0.00	varies	varies	varies	varies	varies	\$0.00	varies	1,478.62	\$75,360.32



EXHIBIT 14b ANNUAL STATE AGENCY BURDEN AND COST										
	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	Respon. Hours Per Year	Labor Cost Per Year	O&M Costs	Number of Respondent Activities	Total Hours Per Year	Total Cost Per Year
<b>Tank Systems - Interim Status</b>										
Review equivalent containment device information	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	1.19	\$39.01
Review information submitted for exemption from 24-hour leak detection requirement	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review information submitted for variance from secondary containment requirements	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review information submitted for exemption from the 24-hour waste removal requirement	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.15	\$4.88
Review release notifications and reports	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review major repair certifications	0.00	0.00	8.00	0.00	8.00	\$262.72	\$0.00	0	0.00	\$0.00
Review decontamination demonstrations	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
<b>Tank Systems - Permitted</b>										
Review information submitted for exemption from the 24-hour waste removal requirement	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	5	18.00	\$591.12
Review release notifications and reports	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	27	108.00	\$3,546.72
Review major repair certifications	0.00	0.00	8.00	0.00	8.00	\$262.72	\$0.00	0	0.00	\$0.00
Review decontamination demonstrations	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
<b>Surface Impoundments - Interim Status</b>										
Review assessments of alternate design and operating practices	0.00	0.00	16.00	0.00	16.00	\$525.44	\$0.00	0	0.00	\$0.00
Review notifications of intent to receive waste	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$328.40	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$656.80	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.10	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review and establish pump operating levels	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
Review contingent corrective measures plan	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review hazardous waste removal plan	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review extension request	0.00	0.00	0.50	0.00	0.50	\$16.42	\$0.00	0	0.00	\$0.00
Review corrective action report (2 times annually)	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
<b>Surface Impoundments - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review notification of surface impoundment removal from service	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
Review contingent corrective measures plan	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review hazardous waste removal plan	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review extension request	0.00	0.00	0.50	0.00	0.50	\$16.42	\$0.00	0	0.00	\$0.00
Review corrective action report (2 times annually)	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
<b>Waste Piles - Interim Status</b>										
Review exemptions from design and operating requirements	0.00	0.00	7.00	0.00	7.00	\$229.88	\$0.00	0	0.00	\$0.00
Review exemptions from liner/leachate system requirements	0.00	0.00	7.00	0.00	7.00	\$229.88	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$328.40	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$656.80	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.10	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
<b>Waste Piles - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00

<b>EXHIBIT 14b (CONTINUED)</b>										
<b>ANNUAL STATE AGENCY BURDEN AND COST</b>										
	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours Per Year</b>	<b>Labor Cost Per Year</b>	<b>O&amp;M Costs</b>	<b>Number of Respondent Activities</b>	<b>Total Hours Per Year</b>	<b>Total Cost Per Year</b>
<b>Land Treatment - Interim Status</b>										
Review food-chain crop notifications	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review certifications of closure	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
<b>Land Treatment - Permitted</b>										
Review notifications of significant releases of hazardous constituents below the treatment zone	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review notifications of intent to demonstrate that regulated unit is not the source of increase in hazardous constituents	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review demonstrations that regulated unit is not the source of increase in hazardous constituents below the treatment zone	0.00	0.00	16.00	0.00	16.00	\$525.44	\$0.00	0	0.00	\$0.00
Review (264.280)(d) demonstrations	0.00	0.00	8.00	0.00	8.00	\$262.72	\$0.00	0	0.00	\$0.00
Review closure certifications	0.00	1.00	4.00	0.00	5.00	\$186.24	\$0.00	0	0.00	\$0.00
<b>Landfills - Interim Status</b>										
Review notifications of intent to receive waste	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
Review demonstrations for exemption from liner and leachate collection system requirements	0.00	0.00	16.00	0.00	16.00	\$525.44	\$0.00	0	0.00	\$0.00
Review information for waivers of the double liner requirements	0.00	0.00	4.00	0.00	4.00	\$131.36	\$0.00	0	0.00	\$0.00
Review and establish action leakage rates	0.00	0.00	10.00	0.00	10.00	\$328.40	\$0.00	0	0.00	\$0.00
Review Response Action Plans	0.00	0.00	20.00	0.00	20.00	\$656.80	\$0.00	0	0.00	\$0.00
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Enter RAP data into a data base	0.00	0.00	0.00	0.10	0.10	\$2.10	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review and establish pump operating levels	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
Review demonstrations for placing non-hazardous liquid waste in landfills	0.00	0.00	7.00	0.00	7.00	\$229.88	\$0.00	0	0.00	\$0.00
<b>Landfills - Permitted</b>										
Receive and review written action leakage rate exceedance notifications	0.00	0.50	3.50	0.00	4.00	\$142.38	\$0.00	0	0.00	\$0.00
Review leakage reports	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review information submitted when the ALR is exceeded	0.00	0.50	10.00	0.00	10.50	\$355.84	\$0.00	0	0.00	\$0.00
Review demonstrations for placing non-hazardous liquid waste in landfills	0.00	0.00	7.00	0.00	7.00	\$229.88	\$0.00	0	0.00	\$0.00
<b>Incinerators - Interim Status</b>										
Review applications for certification to burn F020, F021, F022, F023, F026, and F027	0.00	0.50	20.00	0.00	20.50	\$684.24	\$0.00	0	0.00	\$0.00
<b>Incinerators - Permitted</b>										
Review notifications of intent to burn hazardous wastes F020, F021, F022, F023, F026, and F027	0.00	0.25	1.00	0.00	1.25	\$46.56	\$0.00	0	0.00	\$0.00
Review demonstrations for exemption from emergency waste feed cutoff system testing requirements (264.347(c))	0.00	0.00	16.00	0.00	16.00	\$525.44	\$0.00	1	14.40	\$472.90
<b>Misc Units - Interim Status and Permitted</b>										
Covered in other ICRs	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0.00	\$0.00
<b>Drip Pads</b>										
Review plan for updating, repairing, and modifying the drip pad	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
Review release notifications and reports	0.00	0.00	1.00	0.00	1.00	\$32.84	\$0.00	0	0.00	\$0.00
<b>Process Vents - Permitted</b>										
Review semiannual reports	0.00	0.00	8.00	0.00	8.00	\$262.72	\$0.00	43	345.60	\$11,349.50

<b>EXHIBIT 14b (CONTINUED)</b>										
<b>ANNUAL STATE AGENCY BURDEN AND COST</b>										
	<b>Legal Hours</b>	<b>Managerial Hours</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Respon. Hours Per Year</b>	<b>Labor Cost Per Year</b>	<b>O&amp;M Costs</b>	<b>Number of Respondent Activities</b>	<b>Total Hours Per Year</b>	<b>Total Cost Per Year</b>
<b>Equipment Leaks - Interim Status</b>										
Review notifications to implement the alternative valve standard in (265.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	1	1.80	\$59.11
Review notifications to discontinue alternative valve standard in (265.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
Review notifications to implement alternative valve standard in (265.1062)(b)(2) or (265.1062)(b)(3)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
<b>Equipment Leaks - Permitted</b>										
Review notifications to implement the alternative valve standard in (264.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	23	45.00	\$1,477.80
Review notifications to discontinue alternative valve standard in (264.1061)(a)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	0	0.00	\$0.00
Review notifications to implement alternative valve standard in (264.1062)(b)(2) or (264.1062)(b)(3)	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	5	10.80	\$354.67
Review semiannual reports	0.00	0.00	8.00	0.00	8.00	\$262.72	\$0.00	68	547.20	\$17,970.05
<b>Containment Buildings - Interim Status</b>										
Collect written notice of request for delay of secondary containment	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	0	0.00	\$0.00
Review and comment on plans to retrofit unit	0.00	0.50	4.00	0.50	5.00	\$169.28	\$0.00	1	4.50	\$152.35
Review response to comments and approve/disapprove delay	0.00	0.25	2.00	0.25	2.50	\$84.64	\$0.00	1	2.25	\$76.17
Receive notification of release	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review written notice, description or remedial steps, and schedule for cleanup	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review information and determine if unit must be removed from service	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	1	1.80	\$59.11
Notify owner/operator in writing of determination	0.00	0.00	0.50	0.25	0.75	\$21.66	\$0.00	1	0.68	\$19.49
Review verification of cleanup	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review demonstration that free liquids are for dust suppression and approve or disapprove waiver	0.00	0.25	1.00	0.25	1.50	\$51.80	\$0.00	1	1.35	\$46.62
<b>Containment Buildings - Permitted</b>										
Collect written notice of request for delay of secondary containment	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	0	0.00	\$0.00
Review and comment on plans to retrofit unit	0.00	0.00	4.00	0.50	4.50	\$141.84	\$0.00	1	4.05	\$127.65
Review response to comments and approve/disapprove delay	0.00	0.50	2.00	0.25	2.75	\$98.36	\$0.00	1	2.48	\$88.52
Receive notification of release	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review written notice, description or remedial steps, and schedule for cleanup	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review information and determine if unit must be removed from service	0.00	0.00	2.00	0.00	2.00	\$65.68	\$0.00	1	1.80	\$59.11
Notify owner/operator in writing of determination	0.00	0.00	0.50	0.25	0.75	\$21.66	\$0.00	1	0.68	\$19.49
Review verification of cleanup	0.00	0.00	0.25	0.00	0.25	\$8.21	\$0.00	1	0.23	\$7.39
Review demonstration that free liquids are for dust suppression and approve or disapprove waiver	0.00	0.25	1.00	0.25	1.50	\$51.80	\$0.00	2	2.70	\$93.24
<b>TOTAL</b>	0.00	varies	varies	varies	varies	varies	\$0.00	varies	1,115.76	\$36,651.85

<b>EXHIBIT 15a</b>					
<b>TOTAL ANNUAL EPA BURDEN AND COSTS</b>					
	Total	Total	Total	Total	Total
	Hours per	Capital Cost per	O&M Cost per	Labor Cost per	Cost per
EXHIBIT	Year	Year	Year	Year	Year
SUBPART I					
CONTAINERS	0	\$0	\$0	\$0	\$0
SUBPART J					
TANK SYSTEMS	181	\$0	\$0	\$9,204	\$9,204
SUBPART K					
SURFACE IMPOUNDMENTS	0	\$0	\$0	\$0	\$0
SUBPART L					
WASTE PILES	0	\$0	\$0	\$0	\$0
SUBPART M					
LAND TREATMENT	0	\$0	\$0	\$0	\$0
SUBPART N					
LANDFILLS	0	\$0	\$0	\$0	\$0
SUBPART O					
INCINERATORS	2	\$0	\$0	\$82	\$82
SUBPART X					
MISCELLANEOUS UNITS	0	\$0	\$0	\$0	\$0
SUBPART W					
DRIP PADS	0	\$0	\$0	\$0	\$0
SUBPART AA					
PROCESS VENTS	356	\$0	\$0	\$18,148	\$18,148
SUBPART BB					
EQUIPMENT LEAKS	931	\$0	\$0	\$47,460	\$47,460
SUBPART DD					
CONTAINMENT BUILDINGS	9	\$0	\$0	\$466	\$466
PART 266					
SPECIFIC HAZARDOUS WASTE RECOVERY/ RECYCLING FACILITIES	0	\$0	\$0	\$0	\$0
<b>TOTAL EPA BURDEN</b>	<b>1,479</b>	<b>\$0</b>	<b>\$0</b>	<b>\$75,360</b>	<b>\$75,360</b>

<b>EXHIBIT 15b</b>					
<b>TOTAL ANNUAL STATE AGENCY BURDEN AND COST</b>					
	Total	Total	Total	Total	Total
	Hours per	Capital Cost per	O&M Cost per	Labor Cost per	Cost per
EXHIBIT	Year	Year	Year	Year	Year
SUBPART I					
CONTAINERS	0	\$0	\$0	\$0	\$0
SUBPART J					
TANK SYSTEMS	127	\$0	\$0	\$4,182	\$4,182
SUBPART K					
SURFACE IMPOUNDMENTS	0	\$0	\$0	\$0	\$0
SUBPART L					
WASTE PILES	0	\$0	\$0	\$0	\$0
SUBPART M					
LAND TREATMENT	0	\$0	\$0	\$0	\$0
SUBPART N					
LANDFILLS	0	\$0	\$0	\$0	\$0
SUBPART O					
INCINERATORS	14	\$0	\$0	\$473	\$473
SUBPART X					
MISCELLANEOUS UNITS	0	\$0	\$0	\$0	\$0
SUBPART W					
DRIP PADS	0	\$0	\$0	\$0	\$0
SUBPART AA					
PROCESS VENTS	346	\$0	\$0	\$11,350	\$11,350
SUBPART BB					
EQUIPMENT LEAKS	605	\$0	\$0	\$19,862	\$19,862
SUBPART DD					
CONTAINMENT BUILDINGS	24	\$0	\$0	\$786	\$786
PART 266					
SPECIFIC HAZARDOUS WASTE RECOVERY/ RECYCLING FACILITIES	0	\$0	\$0	\$0	\$0
<b>TOTAL STATES BURDEN</b>	<b>1,116</b>	<b>\$0</b>	<b>\$0</b>	<b>\$36,652</b>	<b>\$36,652</b>

<b>EXHIBIT 16a</b>				
<b>TOTAL PRIVATE AVERAGE RESPONDENT BURDEN</b>				
	Interim Status		Permitted	
	Average Reporting Burden	Average Recordkeeping Burden	Average Reporting Burden	Average Recordkeeping Burden
SUBPART I				
CONTAINERS	0	73	0	73
SUBPART J				
TANK SYSTEMS	9	77	3	74
SUBPART K				
SURFACE IMPOUNDMENTS	0	74	0	74
SUBPART L				
WASTE PILES	0	0	0	17
SUBPART M				
LAND TREATMENT	0	0	0	0
SUBPART N				
LANDFILLS	0	0	0	0
SUBPART O				
INCINERATORS	0	0	5	3
SUBPART X				
MISCELLANEOUS UNITS	N/A	N/A	0	0
SUBPART W				
DRIP PADS	0	34	0	0
SUBPART AA				
PROCESS VENTS	0	448	10	399
SUBPART BB				
EQUIPMENT LEAKS	1	47	6	40
SUBPART DD				
CONTAINMENT BUILDINGS	0	0	3	27

<b>EXHIBIT 16b</b>				
<b>TOTAL AVERAGE NON-FEDERAL GOVERNMENTS RESPONDENT BURDEN</b>				
	Interim Status		Permitted	
	Average Reporting Burden	Average Recordkeeping Burden	Average Reporting Burden	Average Recordkeeping Burden
SUBPART I CONTAINERS	0	0	0	73
SUBPART J TANK SYSTEMS	9	77	3	74
SUBPART K SURFACE IMPOUNDMENTS	0	0	0	83
SUBPART L WASTE PILES	0	0	0	0
SUBPART M LAND TREATMENT	0	0	0	0
SUBPART N LANDFILLS	0	0	0	0
SUBPART O INCINERATORS	0	0	0	0
SUBPART X MISCELLANEOUS UNITS	N/A	N/A	0	0
SUBPART W DRIP PADS	0	34	0	0
SUBPART AA PROCESS VENTS	0	27	10	400
SUBPART BB EQUIPMENT LEAKS	1	45	6	43
SUBPART DD CONTAINMENT BUILDINGS	0	0	0	0